

From: Radtke, Meghan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7A364F0FAAD54A79BE238288FA3496CF-RADTKE, MEGHAN]
Sent: 12/1/2016 7:21:25 PM
To: OLEM ORCR EVERYONE [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e0d96bf5ee834f4db8170b8236e7148a-OSWER ORCR EVERYONE]; Regional RCRA Directors & Deputies [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2df008b20b5548bca5cf38c6e1c1a527-Regional RCRA Directors & Deputies]; Mitchell, Judy-Ann [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2b08d65c0ca2414884271df3397a6e6e-Mitchell, Judy-Ann]; McDonald, Carolyn [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=52b50ff34e1948a5aabaa8e256fb7bf8-CMcdon02]
Subject: ORCR Weekly Report 12/5/16-12/16/16
Attachments: orcr_weekly 12-5-16.docx

Consolidated Report to the AA
Office of Land and Emergency Management
Office of Resource Conservation and Recovery
for the Weeks of 12/5/16 – 12/16/16

Informational/No Action

RCRA Subtitle C Permit - Tradebe

- On December 5th, representatives from Tradebe Treatment and Recycling, LLC are meeting with ORCR. Tradebe is located in East Chicago, IN and accepts a wide variety of off-site wastes, including hazardous wastes. Their core process is liquid distillation for solvent recovery; other main processes are fuel blending and operation of solids distillation systems (SDS) that produce a degreaser product and fuels that are sent to hazardous waste burning cement kilns. The Environmental Technology Council (ETC) has objected to Indiana's decision to not require a RCRA subtitle C permit for the thermal treatment/recycling operations associated with their SDS operations (in part) because three facilities were required to obtain RCRA permits in Region 6 for similar activities. The ETC has stated that they intend to file a RCRA citizen's suit if the matter is not corrected. ORCR is working closely with Regions 5 and 6 to assess the issue.

Sustainable Materials Management

- On December 6th, glass industry representatives will be meeting with ORCR regarding recycling measurement, the WARM model, and the current EPA waste hierarchy.
- On December 13th, ORCR will be meeting with Susan Robinson from Waste Management to discuss ongoing and future Waste Management and EPA efforts related to materials measurement.

CERCLA 108(b)

- ORCR is meeting with groups of stakeholders including environmental groups, the hard rock mining industry, Congressional reps, financial instruments, and states, to provide a brief overview of the Hard Rock Mining rule.

Speaking Engagements in the next 60 days

- On December 6th, Barnes Johnson will participate in Region 4's EPA-States, RCRA Director meeting in Atlanta, Georgia.
- On December 8th, ORCR will host RCRA Next – a one day discussion forum for exploring the directions RCRA could take during the next 40 years. Invited speakers will include stakeholders from industry, government, and others.

- On December 12-13, Kathleen Salyer will participate in the Resource Efficiency and Low Carbon Society: Identifying Opportunities and Implications under the G7-Alliance on Resource Efficiency in Tokyo, Japan. Kathleen will provide an update of U.S. work and participate in discussions to further resource efficiency in the U.S. and worldwide.
- On December 14-15, Kathleen Salyer will provide an update of U.S. work on sustainable materials management at the Workshop on International Resource Recycling under the G7-Alliance on Resource Efficiency in Tokyo, Japan.
- On January 7, Barnes Johnson will attend the Consumer Electronics Show in Las Vegas to present awards to e-Challenge participants and moderate a discussion panel entitled, "Sustainability Issues for a New Administration/Congress."
- (NEW) From January 10-12, Barnes Johnson (tentative) will chair the first meeting of the e-Manifest Advisory Board, to be held in Arlington, VA. The meeting will focus on systems operations for Day 1 of e-Manifest and user fees.

Public Announcements in the next 60 days

- (UPDATED) In early December, ORCR plans to release the final *Guidelines for Evaluating the Post-Closure Care Period for Hazardous Waste Disposal Facilities under Subtitle C of RCRA* (Post-Closure Care Guidance). This guidance recommends criteria for consideration in assuring that human health and the environment will be adequately protected in making decisions to extend, shorten, or end the post-closure care period for hazardous waste disposal facilities subject to Subtitle C of RCRA. The guidance has the additional benefit of helping regulated entities understand the factors that can affect the length of the post-closure care period and the costs associated with land disposal so they can better evaluate long-term waste management strategies, including waste minimization.
- On December 12th, ORCR will host a webinar on the Export/Import Rule.
- (NEW) In late December or early January, ORCR anticipates releasing "RCRA Public Participation Manual, 2016 Edition," (PPM) a user's guide for how community members, tribes, regulators, and industry can better utilize RCRA's provisions to achieve greater engagement in the permitting process. The PPM highlights digital and social media as communications tools for stakeholders.
- (NEW) In January, ORCR anticipates hosting a webinar on the proposed CERCLA 108(b) Hard Rock Mining rule. The webinar will provide an overview of the rule for stakeholders.

Meghan Radtke, Ph.D., Biologist
 Special Assistant
 Office of Resource Conservation and Recovery
 Office of Land and Emergency Management
 U.S. Environmental Protection Agency
 Desk phone: 703-347-0229
 Mobile: [REDACTED]

Message

From: Celeste, Laurel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8F5194A050CE4B758E02E6835FE0B43D-CELESTE, LAUREL]
Sent: 1/19/2017 3:09:37 PM
To: Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]
CC: Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]; Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]; Kaps, Melissa [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2fd9ca1cc4f145df83c8bdd2b683a290-mkaps]
Subject: Re: TDUs

John just forwarded it to me-- [REDACTED]

[REDACTED] I'll be at PY on Monday; I have a mtg with

Barnes at 11 but am otherwise free.

[REDACTED]

From: Galbraith, Michael
Sent: Thursday, January 19, 2017 9:58:11 AM
To: Celeste, Laurel
Cc: Atagi, Tracy; Kohler, Amanda; Kaps, Melissa
Subject: Fw: TDUs

Hi Laurel. Have you heard anything about ETC's (David Case's) intent to file a citizen suit against EPA for not requiring a rcra permit for a facility named Tradebe, located in Indiana? [REDACTED]

[REDACTED]

This is too complicated to summarize in an email, [REDACTED]

[REDACTED]

Are you in the PY office next week by chance so we can discuss? I also attached a summary paper sasha put together last year - its not current with all the latest but its a good summary of the facility/issues.

If someone else in your shop will be handling this let me know (I wasn't sure how busy you were with other stuff - plus a big part of this puzzle will likely depend on the outcome of the dsw/recycling aspect of this)

Mike Galbraith
Permits Branch (5303P)
Program Implementation/Information Division
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

From: Radtke, Meghan
Sent: Thursday, January 19, 2017 6:31 AM
To: Galbraith, Michael
Subject: Fwd: TDUs

Wasn't sure who else is working on this at the staff level. Trust you will distribute accordingly!

Meghan

Meghan Radtke, Ph.D.
Special Assistant
Office of Resource Conservation and Recovery
Office of Land and Emergency Management
Office: 703-347-0229
Mobile: 703-472-8215

Begin forwarded message:

From: "Johnson, Barnes" <Johnson.Barnes@epa.gov>
Date: January 18, 2017 at 17:43:17 EST
To: "Devlin, Betsy" <Devlin.Betsy@epa.gov>, "Elliott, Ross" <Elliott.Ross@epa.gov>, "Sasseville, Sonya" <Sasseville.Sonya@epa.gov>, "Guernica, Mimi" <Guernica.Mimi@epa.gov>, ORCR IO <ORCR_IO@epa.gov>
Cc: "Michaud, John" <Michaud.John@epa.gov>, "Lewis, Jen" <Lewis.Jen@epa.gov>
Subject: FW: TDUs

FYI – at the eManifest FACA meeting last week I asked David the specifics of his threatened suit. He offered to send me an email to explain. The discussion below outlines the basis of including EPA as a defendant in his threatened citizen suit.

Barnes Johnson

USEPA | Resource Conservation and Recovery | Tel 703-308-8895 |
johnson.barnes@epa.gov | [@EPALand](#)

From: David Case [mailto:dcase@etc.org]
Sent: Tuesday, January 17, 2017 2:59 PM
To: Johnson, Barnes <Johnson.Barnes@epa.gov>
Subject: TDUs

Barnes,

You asked me last week to explain the legal basis for including EPA in the citizen suit that has been drafted. Here is a short summary:

RCRA Section 3007 requires the Administrator or authorized state "to thoroughly inspect every facility for the treatment, storage, or disposal of hazardous waste for which a [RCRA] permit is required" at least every two years. RCRA uses the word "shall" which makes this inspection requirement a mandatory, non-discretionary duty. Upon information and belief, EPA has not conducted a RCRA inspection of the thermal desorption units (TDUs), nor has the State of Indiana.

In addition, RCRA Section 3005 requires a permit for the thermal treatment and disposal of hazardous wastes in the TDUs, and the regulatory exemption for recycling units does not apply. Because the facility does have a RCRA permit for its other hazardous waste activities, but not for thermal treatment and destruction of hazardous wastes in the TDUs, the Administrator also has a non-discretionary duty to revoke the facility's RCRA permit. RCRA Section 3005(e) provides: "Upon a determination by the Administrator ... of noncompliance by a facility having a permit under this chapter with the requirements of this section ..., the Administrator ... shall revoke such permit." The facility is in noncompliance with the requirements of RCRA section 3005 to obtain a RCRA permit for operation of the TDUs or to include the TDUs within its current permit. RCRA Section 3005(e) uses the word "shall" which makes permit revocation a mandatory, non-discretionary duty.

EPA can satisfy its non-discretionary duties under RCRA by conducting a thorough inspection of the TDUs' operations and including the TDUs within the facility's current or renewed RCRA permit. We believe the facility's RCRA permit is scheduled for renewal this year.

David R. Case

Executive Director

1112 16th Street NW, Suite 420

Washington DC 20036

(202) 783-0870 x201

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Message

From: Galbraith, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0ABF7F5C1A5E462E8096CB58EF9757EB-MGALBRAI]
Sent: 6/29/2017 5:04:18 PM
To: Behan, Frank [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b37b3a6d67644ad3bf5717d99610941e-FBEHAN]; Gerhard, Sasha [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=409f48684eb4422cb13177fc9702d0fa-Gerhard, Sasha]; Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]
CC: Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]; Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]
Subject: face to face with tradebe

Tradebe wants to fly in to talk us. They want to bring their technical folks to answer any questions we may have.

Can you look at your calendars and let me know what days or weeks, won't work.

I'm thinking 2nd or third week in July will be best – but I'm open to suggestions.

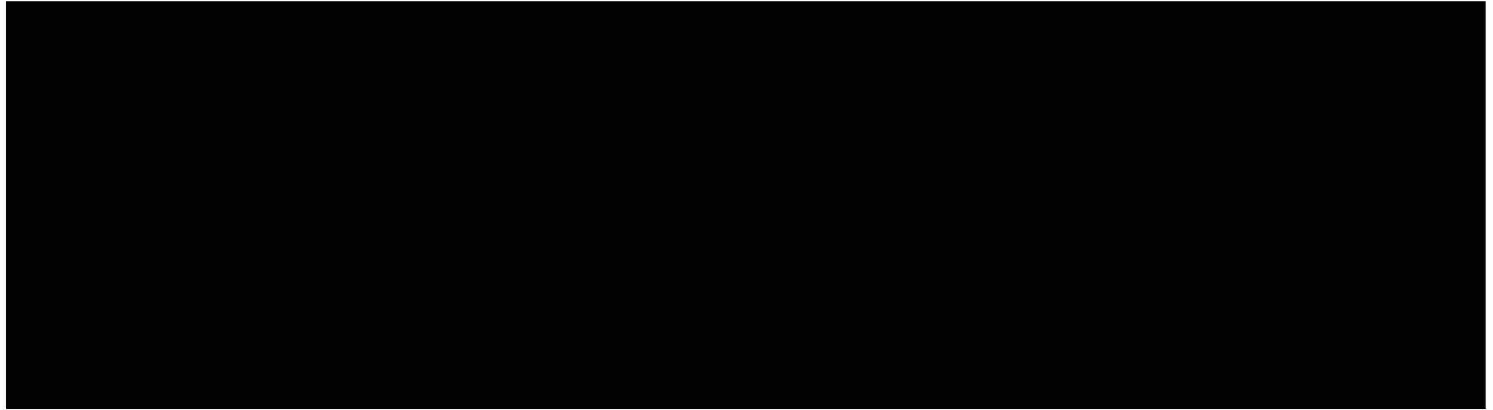


Mike Galbraith
Permits Branch (5303P)
Program Implementation/Information Division
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

(703) 605-0567

Message

From: Young, Jessica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=26404C78D3DC441F810AC723CF8F9D49-JBIEGELS]
Sent: 7/16/2018 6:29:10 PM
To: Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]
Subject: RE: DSW Rule and TDUs



Thanks,
Jessica

Jessica Young
Chief of Recycling and Generator Branch
Office of Resource Conservation and Recovery
Desk Phone: 703-308-0026

From: Brian Lindman [mailto:brian.lindman@usecology.com]
Sent: Saturday, July 14, 2018 6:25 PM
To: Young, Jessica <Young.Jessica@epa.gov>
Subject: DSW Rule and TDUs

Hi, Jessica,

We have never met, but have been together on a few calls lately regarding the DSW-Verified Recycler Exclusion (VRE) and the Thermodyne TDU in Louisiana.

Andy Marshall our EVP of EHS and myself will be in Washington this week for some other meetings and were wondering if you had a moment to sit down with us to discuss the VRE and our concerns with it impacting regulatory consistency across the country.

We have Thursday afternoon wide open for you, but are open to other times if that does not work for you?

You can also call me at 303-818-5456 if you prefer.

Brian Lindman
Environmental Regulatory Director
p.(303) 818-5456

Message

From: Fruitwala, Kishor [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7A19009BA86A4236B97131D5D16F2FAE-FRUITWALA, KISHOR]
Sent: 7/16/2018 2:15:17 PM
To: Luschek, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cd6769c1089e464ebe6e5f345960a0cf-Luschek, Robert]; Shah, Harry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=774b35da290741798fca0ed737f707aa-Shah, Harry]; Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Tidmore, Guy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e9af087a1ce4703b25a4a8e6fa048dd-Tidmore, Guy]; Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]; Tidmore, Guy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e9af087a1ce4703b25a4a8e6fa048dd-Tidmore, Guy]; Toups, Brad [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f79bc386bf8c4ab681f4e156b456d9a5-Toups, Brad]; Peace, Michelle [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=13a0429431cb4de484548396727a27c6-Peace, Michelle]; Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]; Thompson, Steve [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=deb5f1524ae94dc69ed0f4b2d6ca446a-Thompson, Steve]
Subject: FW: Thermaldyne Process Discussion pfd
Attachments: Thermaldyne PFD Rev 1.pdf

Hi All,

Please see email/attachment below from US Ecology for discussion at 1 pm (central) time today. The agenda and call-in info (from US Ecology) is also provided below.

Thank you.

Kishor

Kishor Fruitwala, Ph.D., P.E.
Acting Associate Director for RCRA
Multimedia Division, EPA Region 6
214-665-6669

From US Ecology:

1. Go over Heat & Material Balance for Thermaldyne with and without emission limits.
Three cases: mercury, arsenic and hydrochloric acid.
2. Open discussion.

Please use the following GoToMeeting call-in. We will share PFD and H&M Balance screens, so joining meeting thru the web interface will allow you to see these on your computer. The phone number gives the best voice contact, so that is recommended.

TCEQ/EPA - US Ecology / TD*X



First GoToMeeting? Let's do a quick system check: <https://link.gotomeeting.com/system-check>

From: Carl Palmer [mailto:cpalmer@tdxassociates.com]

Sent: Monday, July 16, 2018 8:08 AM

To: Fruitwala, Kishor <Fruitwala.Kishor@epa.gov>; Tidmore, Guy <tidmore.guy@epa.gov>; Luschek, Robert <Luschek.Robert@epa.gov>; Young, Jessica <Young.Jessica@epa.gov>; Shah, Harry <Shah.Harry@epa.gov>; Galbraith, Michael <Galbraith.Michael@epa.gov>

Cc: Gregg Meyers <gmeyers@tdxassociates.com>; George Hay <ghay@fmtinc.com>; Brian Lindman <Brian.Lindman@usecology.com>

Subject: Thermaldyne Process Discussion pfd

We have prepared a heat and material balance for the Thermaldyne process as proposed for hazardous waste thermal treatment in Louisiana. It is attached. This PFD will be the primary material that we discuss on the call this afternoon.

We will also discuss the fact that in the variance as written by LDEQ, listed waste codes do not apply to 85% of the feed material that is generated as residuals from the hazardous waste recycling. This is contrary to the rulemaking for refinery OBHSM [261.4(a)(12)] that clearly states that all residuals from refinery OBHSM recycling are listed waste F037. The variance as written by LDEQ states:

... Thermaldyne shall make a hazardous waste determination on any residuals generated from the reclamation of the OBHSM. The residuals are a point of new generation of material. Upon intent to be discard the residuals must be properly characterized and managed in accordance with Louisiana Solid Waste and/or Hazardous Waste Regulations as applicable.

The most likely interpretation of the above condition will be that TDU desorber solids will be tested for hazardous waste characteristics (D codes) and if below those levels will be discarded as non-hazardous industrial solid waste, at most. They will not be tested for LDR compliance for either F037 criteria, or UTS UHC criteria. This could also be done for the centrifuge cake that is not "reclaimed" in the TDU but rather simply discarded after centrifuging. Also, waste water that is spilled or otherwise discarded would not be subjected to F037 waste-water LDR testing.

We'll talk at 1 Central.

Carl

--

Carl R. Palmer, P.E.
TD*X Associates LP

ED_002099_0000999-00002

(919) 349-1583 mobile

Appointment

From: Atagi, Tracy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EBCFD670077440DFB63A691749F20AF2-TATAGI]
Sent: 5/3/2017 6:54:21 PM
To: Behan, Frank [Behan.Frank@epa.gov]
Subject: FW: TDU Discussion
Location: Susan's Office
Start: 5/3/2017 7:30:00 PM
End: 5/3/2017 8:30:00 PM
Show Time As: Tentative
Importance: Low

From: Spalding, Susan
Sent: Thursday, April 27, 2017 4:49:25 PM (UTC-05:00) Eastern Time (US & Canada)
To: Spalding, Susan; Atagi, Tracy; Elliott, Ross; Jones, Bruce; Fruitwala, Kishor; Luschek, Robert
Cc: Smith, Suzanne; Przyborski, Jay
Subject: TDU Discussion
When: Wednesday, May 3, 2017 3:30 PM-4:30 PM.
Where: Susan's Office

Call i
Code

Appointment

From: Atagi, Tracy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EBCFD670077440DFB63A691749F20AF2-TATAGI]
Sent: 11/3/2016 8:01:09 PM
To: Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]
Subject: Accepted: Tradebe update: Call-in #: [REDACTED]
Location: DCRoomPYS6731/DC-Potomac-Yard-South-ORCR
Start: 11/4/2016 5:30:00 PM
End: 11/4/2016 6:30:00 PM
Show Time As: Busy

Appointment

From: Atagi, Tracy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EBCFD670077440DFB63A691749F20AF2-TATAGI]
Sent: 11/3/2016 6:26:05 PM
To: Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]
Subject: Accepted: Tradebe update: Call-in #: [REDACTED]
Location: DCRoomPYS6731/DC-Potomac-Yard-South-ORCR
Start: 11/4/2016 5:30:00 PM
End: 11/4/2016 6:30:00 PM
Show Time As: Busy

Appointment

From: Atagi, Tracy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EBCFD670077440DFB63A691749F20AF2-TATAGI]
Sent: 4/12/2017 1:56:45 PM
To: Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]
Subject: Fw: Tradebe Discussion
Location: 1712

Start: 4/17/2017 4:00:00 PM
End: 4/17/2017 5:00:00 PM
Show Time As: Tentative

From: Lee, Jae
Sent: Tuesday, April 4, 2017 2:59 PM
To: Lee, Jae; Valentino, Michael; Victorine, Gary; Setnicar, Mary; Chow, Kevin; Galbraith, Michael; Fruitwala, Kishor; Tidmore, Guy; Atagi, Tracy; Shah, Harry; Cunningham, Michael; R5LCD-ConfCallLine-RCRA/Conference-Call-Line/R5-LCD
Subject: Tradebe Discussion
When: Monday, April 17, 2017 12:00 PM-1:00 PM.
Where: 1712
It seems that April 17, 11:00am, CDT is a best time for all. Kishor might be conflict for 15 minutes. I hope he can join us a little late.
Please use [REDACTED]
With code [REDACTED]
Conference room #1712B is reserved for Region 5 staffs

Appointment

From: Atagi, Tracy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EBCFD670077440DFB63A691749F20AF2-TATAGI]
Sent: 7/19/2018 12:44:24 PM
To: Beth Mickelson [Beth.Mickelson@usecology.com]

Subject: Tentative: Conference Call re: Consistent National Regulation of TDUs
Location: [REDACTED]

Start: 7/25/2018 7:00:00 PM
End: 7/25/2018 8:00:00 PM

Recurrence: (none)

Appointment

From: Atagi, Tracy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EBCFD670077440DFB63A691749F20AF2-TATAGI]
Sent: 6/25/2018 6:05:31 PM
To: Elliott, Ross [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33cb08013cc94c21a3e3236dbad4c4a4-REELLIOT]
CC: Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]
Subject: Fw: Louisiana Thermaladyne Draft Permit
Location: Wren's conf room on 7th floor

Start: 6/26/2018 7:00:00 PM
End: 6/26/2018 8:00:00 PM
Show Time As: Tentative

From: Fruitwala, Kishor
Sent: Thursday, June 21, 2018 2:45 PM
To: Fruitwala, Kishor; Jones, Bruced; Przyborski, Jay; Lushek, Robert; Kevin Matthews; Stenger, Wren; Potts, Mark; Atagi, Tracy
Cc: Harrison, Ben; Smith, Suzanne
Subject: Louisiana Thermaladyne Draft Permit
When: Tuesday, June 26, 2018 3:00 PM-4:00 PM.
Where: Wren's conf room on 7th floor


Hi All,

Here is an update on the meeting:

1. Please see below the agenda items suggested by Kevin Matthews representing US Ecology.
2. The meeting location has changed from 13th floor to 7th floor.
3. Call in #: [REDACTED]

Thank you.

Kishor

Kishor Fruitwala, Ph.D.
Chief, RCRA Permits Section (6MM-RP)
Multimedia Division, EPA Region 6
214-665-6669 

From: Kevin Matthews [mailto:KMatthews@nationalstrategies.com]
Sent: Thursday, June 21, 2018 1:14 PM
To: Fruitwala, Kishor <Fruitwala.Kishor@epa.gov>

Cc: gmeyers@tdxassociates.com; cpalmer@tdxassociates.com; JD Head <JHead@fbhg.law>; Brian Lindman <Brian.Lindman@usecology.com>; Andrew Marshall <andrew.marshall@usecology.com>

Subject: RE: Louisiana Thermaldyne Draft Permit

Thanks Kishor – we appreciate your assistance on arranging this. Below is our proposed agenda and we welcome your questions on it. In the meeting will be:

Carl Palmer and Gregg Meyers of TD*X

Brian Lindman, US Ecology

Kevin Matthews, Consultant to TD*X and US Ecology

Attending via phone:

JD Head, Outside Counsel to TD*X

George Hay, TD*X

Proposed Agenda:

- 1) Introductions
- 2) Rineco TDU Region 6 enforcement case and subsequent Court Findings
- 3) USE/TD*X facility in Robstown, TX, Region 6 enforcement CAFO, and RCRA permit.
- 4) Thermaldyne LA facility, VRE Variance, Public Comment Period
- 5) Issue on ability to permit the LA facility vis a vie its operations and requirements under RCRA compared to USE/TD*X facility
- 6) USE/TD*X comments on the LA permits:
 - o Air Permit Non-Major Source
 - o LPDES Water Permit
- 7) Likely Scenario if VRE Granted
 - o CWM withdraws Part B permit, operates two TDUs outside of RCRA
 - o Multiple other TDU operators install unpermitted TDUs (Clean Harbors, Veolia, USE, Tradebe, etc)
 - o Refineries pull centrifuge operations outside to exclude cake and wastewater from RCRA F037
- 8) Next Steps

Appointment

From: Atagi, Tracy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EBCFD670077440DFB63A691749F20AF2-TATAGI]
Sent: 7/17/2018 8:22:57 PM
To: Valdez, Heather [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EB323347294D44009A369C3576798BDF-VALDEZ, HEATHER]
Subject: Tentative: Hazardous Waste Thermal Desorption
Location: R10Sea-ConfLineMM-[REDACTED]
Start: 7/20/2018 6:30:00 PM
End: 7/20/2018 7:30:00 PM
Recurrence: (none)

Message

From: Galbraith, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0ABF7F5C1A5E462E8096CB58EF9757EB-MGALBRAI]
Sent: 5/10/2017 7:20:20 PM
To: Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]
Subject: Fw: Giant Cement and Rineco Memos
Attachments: RO 11684.pdf; Final Signed Rineco Ltr AD.pdf; Response to Rineco AD Questions.pdf

Mike Galbraith
Permits Branch (5303P)
Program Implementation/Information Division
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Phone: (703) 605-0567
Fax: (703) 308-0509

----- Forwarded by Michael Galbraith/DC/USEPA/US on 05/10/2017 03:18 PM -----

From: Michael Galbraith/DC/USEPA/US
To: Sasha Gerhard/DC/USEPA/US@EPA,
Date: 02/07/2013 11:40 AM
Subject: Fw: Giant Cement and Rineco Memos

some important files, including the letter from r6 (cyndi kaleri) saying rineco was not an incinerator

Mike Galbraith
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Fax: (703) 308-0509

----- Forwarded by Michael Galbraith/DC/USEPA/US on 02/07/2013 11:38 AM -----

From: Vishnu Katari/DC/USEPA/US
To: Michael Galbraith/DC/USEPA/US@EPA
Date: 06/21/2012 10:34 AM

Subject: Re: Fw: Giant Cement and Rineco Memos

Thanks Mike.

Vishnu Katari
Waste & Chemical Enforcement Div.
Office of Civil Enforcement/OECA
Tel: (202) 564 4004

From: Michael Galbraith/DC/USEPA/US
To: Vishnu Katari/DC/USEPA/US@EPA
Date: 06/21/2012 08:46 AM
Subject: Fw: Giant Cement and Rineco Memos

these 3 memos address the two issues we discussed

Mike Galbraith
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Program Implementation/Information Division
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

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Fax: (703) 308-0509

----- Forwarded by Michael Galbraith/DC/USEPA/US on 06/21/2012 08:41 AM -----

From: Michael Galbraith/DC/USEPA/US
To: Mimi Guernica/DC/USEPA/US@EPA, Sonya Sasseville/DC/USEPA/US@EPA
Date: 06/15/2012 01:22 PM
Subject: Fw: Giant Cement and Rineco Memos

Mike Galbraith
Permits Branch (5303P)
Program Implementation/Information Division
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Phone: (703) 605-0567
Fax: (703) 308-0509

----- Forwarded by Michael Galbraith/DC/USEPA/US on 06/15/2012 01:10 PM -----

From: Guy Tidmore/R6/USEPA/US
To: Michael Galbraith/DC/USEPA/US@EPA
Date: 06/15/2012 11:34 AM
Subject: Fw: Giant Cement and Rineco Memos

Guy Tidmore, Chief (6EN-HE)
Compliance Enforcement Section
Hazardous Waste Enforcement Branch
(214)665-3142 direct
(214)789-2586 cell
(214)665-7446 fax

----- Forwarded by Guy Tidmore/R6/USEPA/US on 06/15/2012 10:30 AM -----

From: Evan Pearson/R6/USEPA/US
To: Guy Tidmore/R6/USEPA/US@EPA
Date: 06/15/2012 09:54 AM
Subject: Giant Cement and Rineco Memos



RO 11684.pdf



Final Signed



Rineco Ltr AD.pdf Response to Rineco AD Ques...

Evan L. Pearson
Senior Enforcement Counsel (6RC-ER)
RCRA Enforcement Branch
Office of Regional Counsel
U.S. EPA - Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733
Phone - (214) 665-8074
Fax - (214) 665-3177
E-Mail - pearson.evan@epa.gov

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Appointment

From: McGee, Tomika [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BDB5ADA148E54AD5B2D8DB3B2543E553-MCGEE, TOMIKA]
Sent: 7/3/2018 1:43:36 PM
To: McGee, Tomika [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bdb5ada148e54ad5b2d8db3b2543e553-McGee, Tomika]; Stenger, Wren [stenger.wren@epa.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; Fruitwala, Kishor [Fruitwala.Kishor@epa.gov]; Gilrein, Stephen [gilrein.stephen@epa.gov]; Potts, Mark [Potts.Mark@epa.gov]; Przyborski, Jay [Przyborski.Jay@epa.gov]; Shah, Harry [Shah.Harry@epa.gov]; Patterson, Alima [Patterson.Alima@epa.gov]; Tidmore, Guy [tidmore.guy@epa.gov]; Pearson, Evan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d10433f23dd64bd2a3efc03d6367856c-Pearson, Evan]; Peace, Michelle [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=13a0429431cb4de484548396727a27c6-Peace, Michelle]; Jones, Bruuced [Jones.Bruuced@epa.gov]; Luschek, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cd6769c1089e464e6e6e5f345960a0cf-Luschek, Robert]
CC: Elliott, Ross [Elliott.Ross@epa.gov]; Stanley, Laura [Stanley.Laura@epa.gov]; Roepe, Wayne [Roepe.Wayne@epa.gov]; Young, Jessica [Young.Jessica@epa.gov]; Kohler, Amanda [Kohler.Amanda@epa.gov]; Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]
Subject: FW: Thermaldyne
Attachments: Thermaldyne draft Exec Summary 07022018 v3.doc
Location: 7th Flr., Little Rock Conf. Rm.
Start: 7/3/2018 4:00:00 PM
End: 7/3/2018 5:00:00 PM
Show Time As: Tentative

-----Original Appointment-----

From: McGee, Tomika
Sent: Tuesday, July 03, 2018 9:41 AM
To: McGee, Tomika; Stenger, Wren; Seager, Cheryl; Fruitwala, Kishor; Gilrein, Stephen; Potts, Mark; Przyborski, Jay; Shah, Harry; Patterson, Alima; Tidmore, Guy; Pearson, Evan; Peace, Michelle; Jones, Bruuced; Luschek, Robert
Cc: Elliott, Ross; Stanley, Laura; Roepe, Wayne; Young, Jessica; Kohler, Amanda; Atagi, Tracy
Subject: FW: Thermaldyne
When: Tuesday, July 03, 2018 11:00 AM-12:00 PM (UTC-06:00) Central Time (US & Canada).
Where: 7th Flr., Little Rock Conf. Rm.

We will be in 6671.

-----Original Appointment-----

From: McGee, Tomika
Sent: Monday, July 2, 2018 5:35 PM
To: McGee, Tomika; Stenger, Wren; Seager, Cheryl; Fruitwala, Kishor; Gilrein, Stephen; Potts, Mark; Przyborski, Jay; Shah, Harry; Patterson, Alima; Tidmore, Guy; Pearson, Evan; Peace, Michelle; Jones, Bruuced; Luschek, Robert
Cc: Elliott, Ross; Stanley, Laura; Roepe, Wayne; Young, Jessica; Atagi, Tracy
Subject: FW: Thermaldyne

When: Tuesday, July 3, 2018 11:00 AM-12:00 PM (UTC-06:00) Central Time (US & Canada).

Where: 7th Flr., Little Rock Conf. Rm.

Hi All,



Thank you.

Kishor

Kishor Fruitwala, Ph.D., P.E.
Acting Associate Director for RCRA
Multimedia Division, EPA Region 6
214-665-6669

-----Original Appointment-----

From: McGee, Tomika

Sent: Thursday, June 28, 2018 12:45 PM

To: McGee, Tomika; Stenger, Wren; Seager, Cheryl; Fruitwala, Kishor; Gilrein, Stephen; Potts, Mark; Przyborski, Jay; Shah, Harry; Patterson, Alima; Tidmore, Guy; Pearson, Evan; Peace, Michelle; Jones, Bruce; Luschek, Robert

Subject: Thermaladyne

When: Tuesday, July 03, 2018 11:00 AM-12:00 PM (UTC-06:00) Central Time (US & Canada).

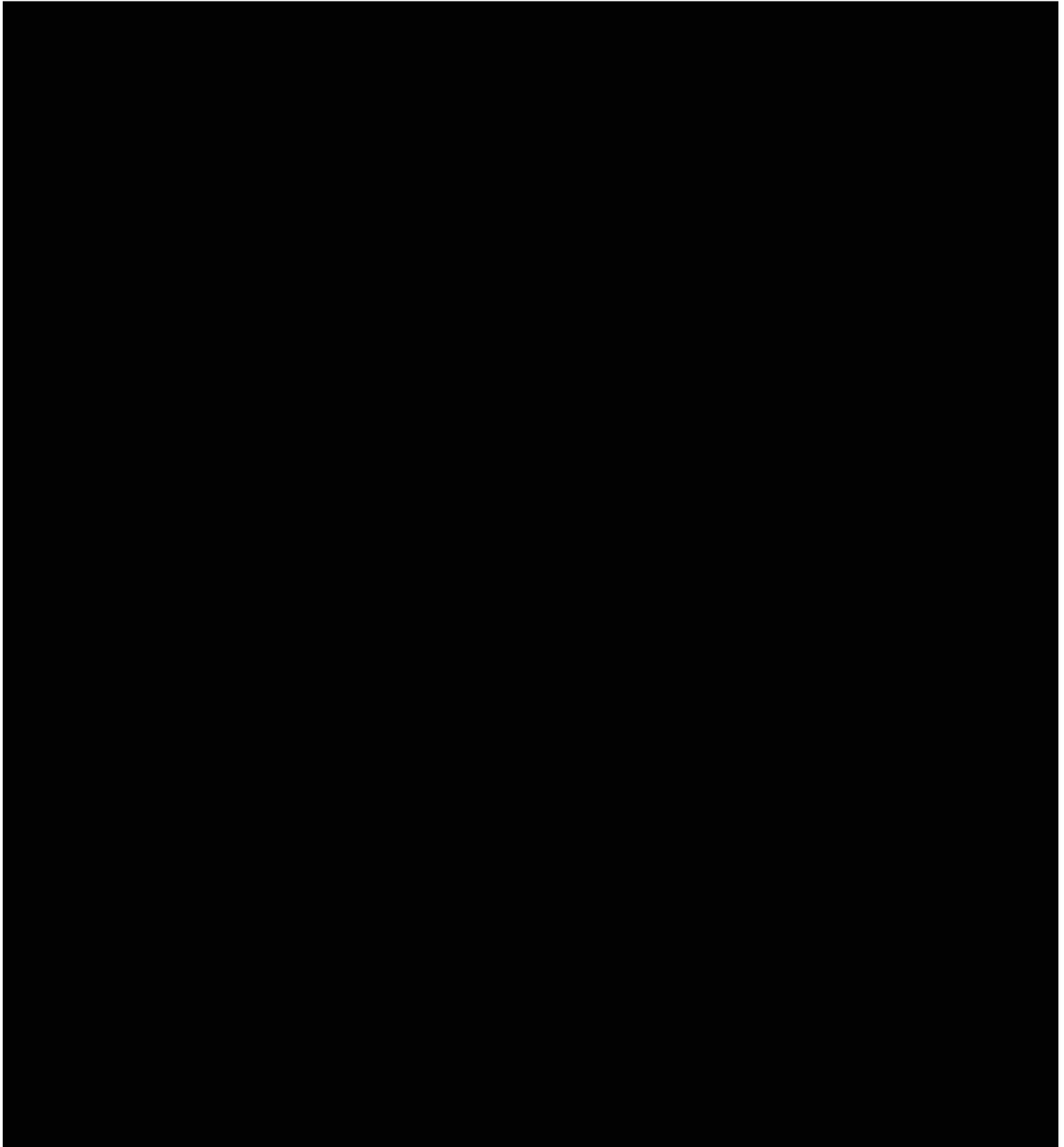
Where: 7th Flr., Little Rock Conf. Rm.

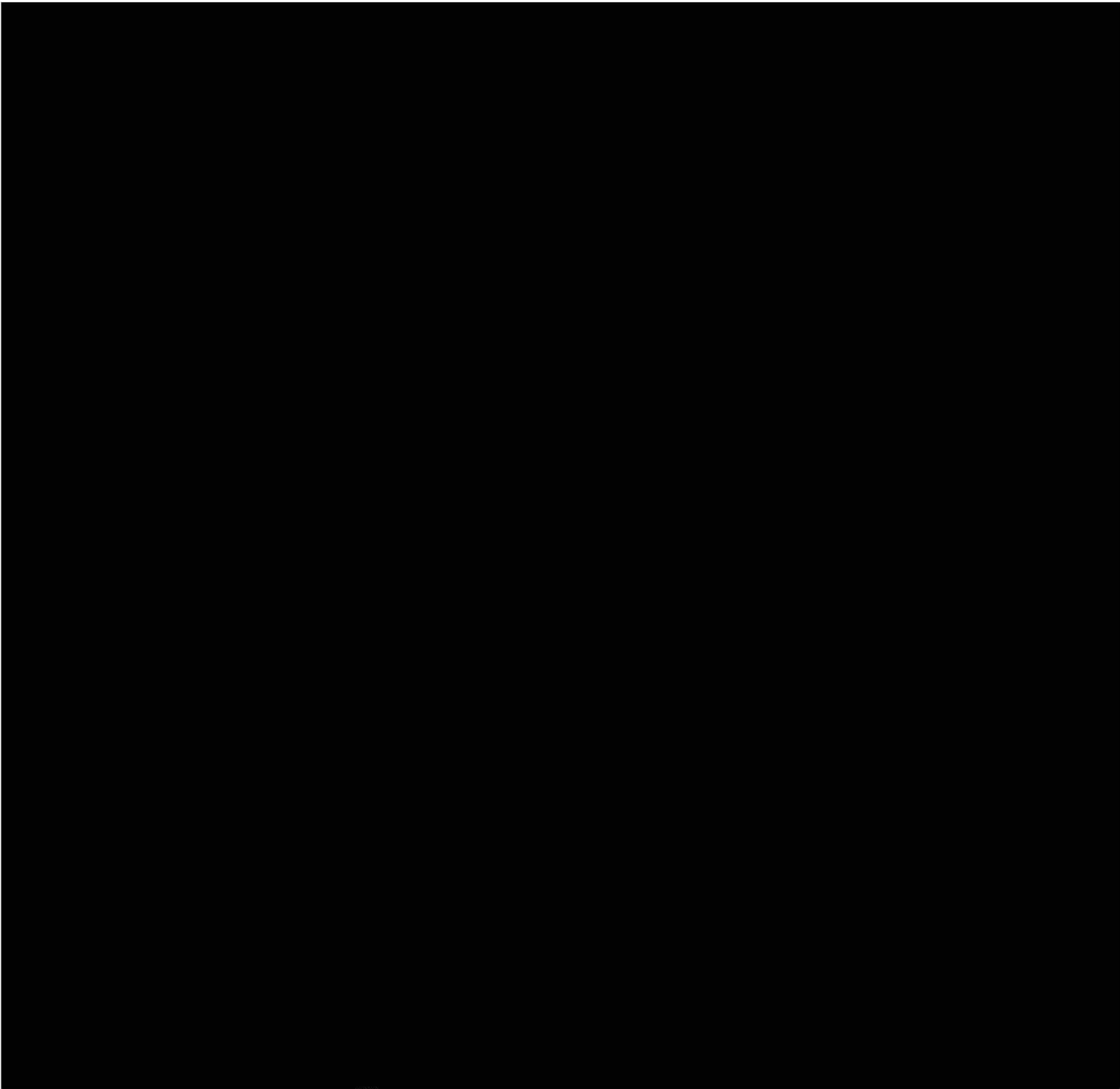
REGION 6 EXECUTIVE SUMMARY

TOPIC: Thermaldyne – Proposed Site Specific Variance dated June 21, 2018 by LDEQ

DATE: 07/02/2018

CONTACT: Kishor Fruitwala, Alima Patterson, Rob Luschek
Bruce Jones, Jay Przyborski, Harry Shah, Michelle Peace,
ORCR: Ross Elliott, Wayne Roepe and Tracy Atagi







Workforce Diversity, **E**nvironmental Stewardship **C**haracter, **A**ccountability, **R**espect, **E**xcellence

Appointment

From: Fruitwala, Kishor [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7A19009BA86A4236B97131D5D16F2FAE-FRUITWALA, KISHOR]
Sent: 6/8/2018 6:57:47 PM
To: Fruitwala, Kishor [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a19009ba86a4236b97131d5d16f2fae-Fruitwala, Kishor]; Jones, Bruce [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9026926c877140cbae1d4c0739729813-Jones, Bruce]; Przyborski, Jay [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9b737242096491996b9d73451f3e848-Przyborski, Jay]; Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcf670077440dfb63a691749f20af2-TATAGI]; Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Elliott, Ross [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33cb08013cc94c21a3e3236dbad4c4a4-REELLIOT]; Luschek, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cd6769c1089e464e6e5f345960a0cf-Luschek, Robert]; Potts, Mark [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f0f11dc437f944fd8cb779b3316de870-Potts, Mark]
CC: Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]; Pearson, Evan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d10433f23dd64bd2a3efc03d6367856c-Pearson, Evan]; Kevin Matthews [KMatthews@nationalstrategies.com]
Subject: Canceled: Thermaldyne
Location: Kishor's office
Start: 6/13/2018 4:30:00 PM
End: 6/13/2018 5:30:00 PM
Show Time As: Free
Importance: High

Mr. Kevin Matthews of NSI has made a request to discuss the Thermaldyne, Louisiana permitting issue. Please see his email below. The following people from US Ecology and TD*X will attend the conf call:

Carl Palmer and Gregg Meyers of TD*X
Andy Marshall of US Ecology
JD Head – counsel to TD*X
Kevin Matthews – consultant to TD*X and USE.

Call in # [REDACTED]
Conf ID [REDACTED]

Thank you.

Kishor
214-665-6669

From: Kevin Matthews [mailto:KMatthews@nationalstrategies.com]

Sent: Tuesday, May 29, 2018 2:41 PM

To: Spalding, Susan <Spalding.Susan@epa.gov>

Subject: LDEQ approach to Verified Recycler Exemption

Susan,

We've had a series of calls/meetings with LDEQ as it relates to the Thermaldyne Permit and VRE. Based on those meetings we would like to request a follow up meeting in Dallas with your team and hopefully the enforcement side of the shop. There are several parts of this approach that we would like to bring to Region 6's attention and provide our thoughts and input as well as answer any questions you may have. We would like to arrange this meeting as soon as possible given the time frame in LA that could allow Thermaldyne to proceed. We are of course happy to work around your schedule. As for background here is a summary of our understanding of LDEQ staff plans for implementing the EPA's rule on the Transfer-Based Exclusion under the Definition of Solid Waste re-write.

- LDEQ stated that they have already adopted the Verified Recycler Exclusion (VRE), and that they do not intend to rescind it. When EPA rescinds the VRE based on the court order, that will not affect LDEQ keeping it in their adopted regulations. They feel that the VRE is more restrictive than the Transfer-Based Exclusion, and that it is acceptable under Federal Law for a State to have regulations that are more restrictive than EPA regs.
- Then, LDEQ said that they plan to allow Thermaldyne to operate their TDU on listed and characteristic hazwaste under the VRE, and thereby exclude their feed material from the DSW by issuing them a VRE variance. They believe that the air permit is sufficient to manage air emissions, and appear to be ready to approve Thermaldyne ops with no additional technical requirements. For information, the Thermaldyne air permit has essentially no technical requirements, nor any demonstration testing requirements, and for practical purposes only restricts Thermaldyne to operate so as to create no visible emissions.
- Then, LDEQ said that they intend to instruct other permitted units (we infer that means Chem Waste) to file Class 1 Mods to remove the TDU from their RCRA permit and operate under the VRE without any technical requirements.

Of course there is a lot of nuance that gets LDEQ to the above positions. Their basic position seems to be that once a waste is excluded from the DSW by variance, the RCRA technical standards don't apply to the recycling process. So, it would seem that if the RCRA technical standards do apply to TDUs that combust all or a portion of their hazardous waste feed, as clearly established by the Rineco and USET/TDX enforcement actions, that the States need to be instructed to not grant VRE variances for that activity, or if they do, to fully incorporate the technical criteria of RCRA (i.e. MACT EEE) into the variance, including a requirement to conduct a performance test.

We do appreciate the time and consideration Region 6 has given this issue to date and we do look forward to discussing as soon as possible.

Please let me know if you have any questions.

Many thanks,
Kevin

KEVIN L. MATTHEWS

NSI | MANAGING DIRECTOR, SUSTAINABILITY SECTOR

1990 K St NW SUITE 320 | WASHINGTON, DC 20006

T 202 . 349 . 7010 (DIRECT)

kmatthews@nationalstrategies.com

www.nationalstrategies.com



Appointment

From: Galbraith, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0ABF7F5C1A5E462E8096CB58EF9757EB-MGALBRAI]
Sent: 11/2/2016 4:12:56 PM
To: Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Elliott, Ross [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33cb08013cc94c21a3e3236dbad4c4a4-REELLIOT]; Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]; Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]; Behan, Frank [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b37b3a6d67644ad3bf5717d99610941e-FBEHAN]; Colon, Lilybeth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6ae6d0cc3f984b08b8101569a2cf6308-Colon, Lilybeth]; Cunningham, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ce197b42b574909995fe91bdfe04ba6-MCunning]; Lee, Jae [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e8957da9f254aab83632814f05d1cd2-JLee10]; Valentino, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=29ccd101653e4a5fae2273a9ae9f7bd0-MValenti]; Setnicar, Mary [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b4cedae7b8aa4f3b968d7a6a40de75ec-MSetnica]; Crossland, Andy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=81610968976f4884852fb0c5265d384e-Crossland, Andy]
CC: Radtke, Meghan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a364f0faad54a79be238288fa3496cf-Radtke, Meghan]
BCC: DCRoomPYS6731/DC-Potomac-Yard-South-ORCR [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=user7ef195fb]
Subject: Tradebe update: [REDACTED]
Location: DCRoomPYS6731/DC-Potomac-Yard-South-ORCR

Start: 11/4/2016 5:30:00 PM
End: 11/4/2016 6:30:00 PM
Show Time As: Busy

Discuss Tradebe and info Region 5 learned from state inspector

Note – Friday was the first day I could schedule this when everyone looked available on calendars. Region 5, if Friday is not a good day let me know and I'll reschedule

For ORCR folks, I reserved room 6731. I'll be teleworking, but will initiate the conference line.

If I missed anyone on the invite, feel free to forward the invite. Thanks!



Appointment

From: Galbraith, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0ABF7F5C1A5E462E8096CB58EF9757EB-MGALBRAI]
Sent: 11/7/2017 2:56:17 PM
To: Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Valdez, Heather [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=eb323347294d44009a369c3576798bdf-Valdez, Heather]; Knittel, Janette [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a955f914e8d34cb19b6f63ac60707d32-Knittel, Janette]; Davies, Lynne [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=169eb6cbdebb4caf85f76390b8ab2674-LDavie12]; Gerhard, Sasha [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=409f48684eb4422cb13177fc9702d0fa-Gerhard, Sasha]
CC: Behan, Frank [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b37b3a6d67644ad3bf5717d99610941e-FBEHAN]; Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]; Mullin, Michelle [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2ae5fc11b98742bab4287b61e107018c-Mullin, Michelle R]
BCC: DCRoomPYS6874/DC-Potomac-Yard-South-ORCR [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=user69b5f6bd]
Subject: fun with tdus
Location: DCRoomPYS6874/DC-Potomac-Yard-South-ORCR
Start: 11/14/2017 5:00:00 PM
End: 11/14/2017 6:00:00 PM
Show Time As: Busy

Updated to include conference line: [REDACTED]

Discussion between HQ and R10 on latest regarding tradebe tdu issue; CWM status; and path forward.

Appointment

From: Galbraith, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0ABF7F5C1A5E462E8096CB58EF9757EB-MGALBRAI]
Sent: 9/15/2017 6:05:12 PM
To: Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Gerhard, Sasha [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=409f48684eb4422cb13177fc9702d0fa-Gerhard, Sasha]; Behan, Frank [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b37b3a6d67644ad3bf5717d99610941e-FBEHAN]; Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]; Valentino, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=29ccd101653e4a5fae2273a9ae9f7bd0-MValenti]; Lee, Jae [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e8957da9f254aab83632814f05d1cd2-JLee10]
CC: Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]; Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]; Setnicar, Mary [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b4cedae7b8aa4f3b968d7a6a40de75ec-MSetnica]; Cunningham, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ce197b42b574909995fe91bdfe04ba6-MCunning]
BCC: DCRoomPYS6811VTC/DC-Potomac-Yard-South-ORCR [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=usercb6514b1]
Subject: tradebe discussion with region 5: Call-in: [REDACTED]
Location: DCRoomPYS6811VTC/DC-Potomac-Yard-South-ORCR
Start: 9/20/2017 4:30:00 PM
End: 9/20/2017 5:30:00 PM
Show Time As: Busy

Recurrence: (none)

discuss tradebe next steps with region 5

Updated to add conf call: [REDACTED]

Appointment

From: Galbraith, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0ABF7F5C1A5E462E8096CB58EF9757EB-MGALBRAI]
Sent: 9/1/2017 3:06:17 PM
To: Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]; Behan, Frank [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b37b3a6d67644ad3bf5717d99610941e-FBEHAN]; Gerhard, Sasha [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=409f48684eb4422cb13177fc9702d0fa-Gerhard, Sasha]; Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]; Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]; Valentino, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=29ccd101653e4a5fae2273a9ae9f7bd0-MValenti]; Lee, Jae [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e8957da9f254aab83632814f05d1cd2-JLee10]
CC: Swetland-Johnson, Karen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a916f4dac0d84c3499b44ee837ae0205-Swetland, K]; Setnicar, Mary [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b4cedae7b8aa4f3b968d7a6a40de75ec-MSetnica]; Cunningham, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0ce197b42b574909995fe91bdfe04ba6-MCunning]
BCC: DCRoomPYS6100Projector/DC-Potomac-Yard-South-ORCR [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=user8c17dd2e]
Subject: meeting with Tradebe technical reps: Call-in: [REDACTED]
Location: DCRoomPYS6100Projector/DC-Potomac-Yard-South-ORCR
Start: 9/28/2017 2:00:00 PM
End: 9/28/2017 3:30:00 PM
Show Time As: Busy
Recurrence: (none)

Tradebe technical reps flying in to discuss their SDS system

Updated to add conf line: [REDACTED]

Appointment

To: Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]; ORCR RCRA Permits Team [ORCR_RCRA_Permits_Team@epa.gov]; Shuster, Kenneth [Shuster.Kenneth@epa.gov]
CC: Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Sommer, Tab [Sommer.Tab@epa.gov]; Hansen, Gail [Hansen.Gail@epa.gov]; Gerhard, Sasha [Gerhard.Sasha@epa.gov]; Gaines, Jeff [Gaines.Jeff@epa.gov]; Swetland-Johnson, Karen [Swetland-Johnson.Karen@epa.gov]; Colon, Lilybeth [Colon.Lilybeth@epa.gov]; Krueger, Anna [Krueger.Anna@epa.gov]; Pease, Michael [pease.michael@epa.gov]
Location: DCRoomPYS6731/DC-Potomac-Yard-South-ORCR; [REDACTED]
Start: 9/13/2018 3:00:00 PM
End: 9/13/2018 4:00:00 PM

Recurrence: (none)

Call-in: [REDACTED]
Conf Ext: [REDACTED]
Participant Code: [REDACTED]

Agenda for today:

- Personnel changes – Ken! Lilybeth! & Skills Marketplace Candidates for OB/OD!
- Recap of Branch Chiefs & ASTSWMO meetings
- Upcoming DDs agenda for October in-person meeting
- TDUs
- Next steps – Op planning for FY19

Appointment

From: Galbraith, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0ABF7F5C1A5E462E8096CB58EF9757EB-MGALBRAI]
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CC: Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]; Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]
BCC: DCRoomPYS6731/DC-Potomac-Yard-South-ORCR [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=user7ef195fb]
Subject: tradebe conf call
Location: DCRoomPYS6731/DC-Potomac-Yard-South-ORCR
Start: 4/18/2017 6:00:00 PM
End: 4/18/2017 7:00:00 PM
Show Time As: Busy

Dial-in: ([REDACTED])
Conf Code: [REDACTED]

Appointment

To: Housley, Denise [Housley.Denise@epa.gov]; Colon, Lilybeth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6ae6d0cc3f984b08b8101569a2cf6308-Colon, Lilybeth]; Buzzell, Tricia [Buzzell.Tricia@epa.gov]; Gerhard, Sasha [Gerhard.Sasha@epa.gov]; Swetland-Johnson, Karen [Swetland-Johnson.Karen@epa.gov]; Gaines, Jeff [Gaines.Jeff@epa.gov]; Krueger, Anna [Krueger.Anna@epa.gov]; Sommer, Tab [Sommer.Tab@epa.gov]; Pease, Michael [pease.michael@epa.gov]; Kohler, Amanda [Kohler.Amanda@epa.gov]; Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Welles, Laura [Welles.Laura@epa.gov]; Leitch, Sharon [Leitch.Sharon@epa.gov]; Everett, Adolph [Everett.Adolph@epa.gov]; Butler, Elizabeth [Butler.Elizabeth@epa.gov]; McGoldrick, Catherine [McGoldrick.Catherine@epa.gov]; Anderson, Meredith [Anderson.Meredith@epa.gov]; Setnicar, Mary [Setnicar.Mary@epa.gov]; Fruitwala, Kishor [Fruitwala.Kishor@epa.gov]; Murrow, Patricia [Murrow.Patricia@epa.gov]; Newland, Jesse [Newland.Jesse@epa.gov]; Gross, Barbara [Gross.Barbara@epa.gov]; Olson, Lisa [Olson.Lisa@epa.gov]; Chang, Patrick [Chang.Patrick@epa.gov]; Azzam, Nidal [Azzam.Nidal@epa.gov]; Cuevas, David [Cuevas.David@epa.gov]; Loesel, Matthew [loesel.matthew@epa.gov]; R9-LND-4-2 [R9-LND-4-2@epa.gov]; Hansen, Gail [Hansen.Gail@epa.gov]; Foster, Barbara [Foster.Barbara@epa.gov]

CC: Zabaneh, Mahfouz [Zabaneh.Mahfouz@epa.gov]; Ruelas, Cynthia [RUELAS.CYNTHIA@EPA.GOV]; Cruz, Amanda [cruz.amanda@epa.gov]; McCullough, Barbara [McCullough.Barbara@epa.gov]; Wicher, Frances [Wicher.Frances@epa.gov]; Sanders-Curry, Madison [sanders-curry.madison@epa.gov]; Page, Jeffrey [Page.Jeffrey@epa.gov]; Mooney, Charlotte [Mooney.Charlotte@epa.gov]; Crossland, Andy [Crossland.Andy@epa.gov]; Spalding, Susan [Spalding.Susan@epa.gov]

Attachments: Issue_Template.docx

Location: PYS - 6621 (Barnes' Conf. Room)

Start: 6/28/2017 3:30:00 PM

End: 6/28/2017 4:30:00 PM

Show Time As: Tentative

Recurrence: (none)

For those at PY, please note the new conference room.

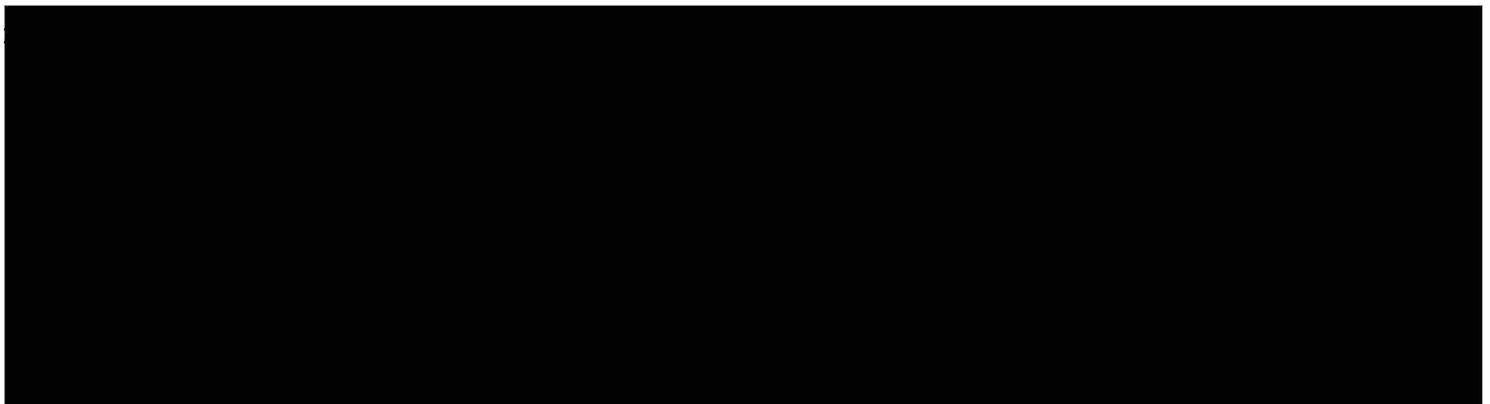
Updating with agenda.

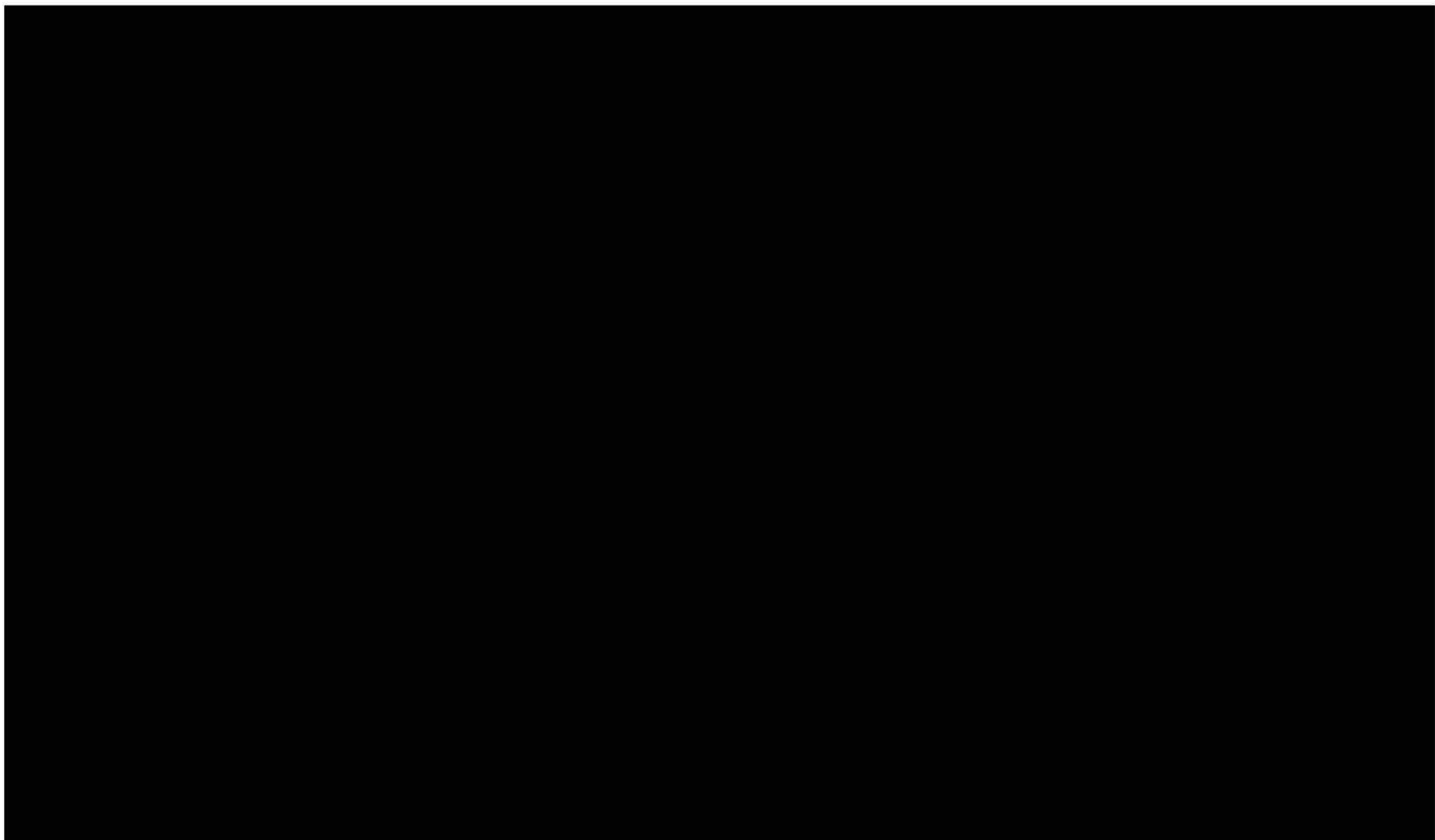
RCRA Permit Integrity Team (PIT) Conference Call

Call-in Number: [REDACTED] **Conference Code:** [REDACTED]

Please contact me if you have questions or want to add items to the agenda.

AGENDA





To: Young, Jessica [Young.Jessica@epa.gov]; Behan, Frank [Behan.Frank@epa.gov]; Foster, Barbara [Foster.Barbara@epa.gov]; Hansen, Gail [Hansen.Gail@epa.gov]; R9-LND-4-2 [R9-LND-4-2@epa.gov]; Loesel, Matthew [loesel.matthew@epa.gov]; Cuevas, David [Cuevas.David@epa.gov]; Azzam, Nidal [Azzam.Nidal@epa.gov]; Chang, Patrick [Chang.Patrick@epa.gov]; Olson, Lisa [Olson.Lisa@epa.gov]; Gross, Barbara [Gross.Barbara@epa.gov]; Newland, Jesse [Newland.Jesse@epa.gov]; Murrow, Patricia [Murrow.Patricia@epa.gov]; Fruitwala, Kishor [Fruitwala.Kishor@epa.gov]; Setnicar, Mary [Setnicar.Mary@epa.gov]; Anderson, Meredith [Anderson.Meredith@epa.gov]; Housley, Denise [Housley.Denise@epa.gov]; McGoldrick, Catherine [McGoldrick.Catherine@epa.gov]; Butler, Elizabeth [Butler.Elizabeth@epa.gov]; Everett, Adolph [Everett.Adolph@epa.gov]; Leitch, Sharon [Leitch.Sharon@epa.gov]; Welles, Laura [Welles.Laura@epa.gov]; Kohler, Amanda [Kohler.Amanda@epa.gov]; Pease, Michael [pease.michael@epa.gov]; Sommer, Tab [Sommer.Tab@epa.gov]; Krueger, Anna [Krueger.Anna@epa.gov]; Gaines, Jeff [Gaines.Jeff@epa.gov]; Swetland-Johnson, Karen [Swetland-Johnson.Karen@epa.gov]; Gerhard, Sasha [Gerhard.Sasha@epa.gov]; Buzzell, Tricia [Buzzell.Tricia@epa.gov]; Colon, Lilybeth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6ae6d0cc3f984b08b8101569a2cf6308-Colon, Lilybeth]; Buzzell, Tricia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1d1892b38f81459f97c51d914dddc73b-pbuzze02]; Gerhard, Sasha [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=409f48684eb4422cb13177fc9702d0fa-Gerhard, Sasha]; Swetland-Johnson, Karen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a916f4dac0d84c3499b44ee837ae0205-Swetland, K]; Gaines, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c0ce5613e3c245b09c6ccad71cf3062a-JGAINE02]; Krueger, Anna [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c2b3ca3f71784b6a8d35709df4b3bdd6-Krueger, An]; Sommer, Tab [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=891a73d2bb1a4d6a8a7727f05ec50161-TTESNAU]; Pease, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3853cbe6e34644309fe19981dbdf3716-Pease, Michael]; Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]; Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Welles, Laura [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d12d5767a8634f48935d8aa59f93d4f6-Welles, Lau]; Leitch, Sharon [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fb121e9196ea4858a7ba325b3b5e4930-Leitch, Sharon]; Everett, Adolph [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=79388de3b66e4443b5d08a43e5f2c2e3-Everett, Adolph]; Butler, Elizabeth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e12e63bc32a4a91940c3fe22537601a-Butler, Elizabeth]; McGoldrick, Catherine [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5600cb0bd0084f0e9375a305b653f42d-McGoldrick,]; Housley, Denise [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3dcb34d4153b4dc7a8f0bc3e60bafa1f-Housley, Sharon]; Anderson, Meredith [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2cd9109bbf3c4818b0e1d333b8652278-Anderson, Meredith]; Setnicar, Mary [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b4cedae7b8aa4f3b968d7a6a40de75ec-MSetnica]; Fruitwala, Kishor [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a19009ba86a4236b97131d5d16f2fae-Fruitwala, Kishor]; Murrow, Patricia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=129f9f814ea04bc08b120e55ccbc94e2-MURROW, PATRICIA]; Newland, Jesse [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fe4df5f2ee47461e85d6327498f39c2f-Newland, Je]; Gross, Barbara [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0251d038d28d452aad788de5f8c4d736-BGROSS]; Olson, Lisa

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CC: Mooney, Charlotte [Mooney.Charlotte@epa.gov]; Page, Jeffrey [Page.Jeffrey@epa.gov]; Sanders-Curry, Madison
[sanders-curry.madison@epa.gov]; Wicher, Frances [Wicher.Frances@epa.gov]; McCullough, Barbara
[McCullough.Barbara@epa.gov]; Cruz, Amanda [cruz.amanda@epa.gov]; Ruelas, Cynthia
[RUELAS.CYNTHIA@EPA.GOV]; Zabaneh, Mahfouz [Zabaneh.Mahfouz@epa.gov]; Page, Jeffrey
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Frances [/o=ExchangeLabs/ou=Exchange Administrative Group
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Madison]

Attachments: PIT_Issue_Summary_LDRs.docx; PIT_Issue_Summary_TDUUs.docx; PIT_Issue_Summary_AABBCC.docx;
PIT_Issue_Summary_PCC.docx

Start: 7/19/2017 3:30:00 PM

End: 7/19/2017 4:30:00 PM

Recurrence: (none)

Updating with agenda.

RCRA Permit Integrity Team (PIT) Conference Call

Please contact me if you have questions or want to add items to the agenda.

AGENDA

1. Issue papers in preparation for the August in-person RCRA Branch Chiefs' meeting (see draft issue papers attached and on our [REDACTED])

- WAP and Related LDR Issues



PIT_Issue_Sum...

- Thermal Desorption Units (TDUs)



PIT_Issue_Sum...

- AA/BB/CC



PIT_Issue_Sum...

- Post-Closure Care Implementation



PIT_Issue_Sum...

To: Young, Jessica [Young.Jessica@epa.gov]; Behan, Frank [Behan.Frank@epa.gov]; Foster, Barbara [Foster.Barbara@epa.gov]; Hansen, Gail [Hansen.Gail@epa.gov]; R9-LND-4-2 [R9-LND-4-2@epa.gov]; Loesel, Matthew [loesel.matthew@epa.gov]; Cuevas, David [Cuevas.David@epa.gov]; Azzam, Nidal [Azzam.Nidal@epa.gov]; Chang, Patrick [Chang.Patrick@epa.gov]; Olson, Lisa [Olson.Lisa@epa.gov]; Gross, Barbara [Gross.Barbara@epa.gov]; Newland, Jesse [Newland.Jesse@epa.gov]; Murrow, Patricia [Murrow.Patricia@epa.gov]; Fruitwala, Kishor [Fruitwala.Kishor@epa.gov]; Setnicar, Mary [Setnicar.Mary@epa.gov]; Anderson, Meredith [Anderson.Meredith@epa.gov]; Housley, Denise [Housley.Denise@epa.gov]; McGoldrick, Catherine [McGoldrick.Catherine@epa.gov]; Butler, Elizabeth [Butler.Elizabeth@epa.gov]; Everett, Adolph [Everett.Adolph@epa.gov]; Leitch, Sharon [Leitch.Sharon@epa.gov]; Welles, Laura [Welles.Laura@epa.gov]; Kohler, Amanda [Kohler.Amanda@epa.gov]; Pease, Michael [pease.michael@epa.gov]; Sommer, Tab [Sommer.Tab@epa.gov]; Krueger, Anna [Krueger.Anna@epa.gov]; Gaines, Jeff [Gaines.Jeff@epa.gov]; Swetland-Johnson, Karen [Swetland-Johnson.Karen@epa.gov]; Gerhard, Sasha [Gerhard.Sasha@epa.gov]; Buzzell, Tricia [Buzzell.Tricia@epa.gov]; Colon, Lilybeth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6ae6d0cc3f984b08b8101569a2cf6308-Colon, Lilybeth]; Buzzell, Tricia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1d1892b38f81459f97c51d914dddc73b-pbuzze02]; Gerhard, Sasha [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=409f48684eb4422cb13177fc9702d0fa-Gerhard, Sasha]; Swetland-Johnson, Karen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a916f4dac0d84c3499b44ee837ae0205-Swetland, K]; Gaines, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c0ce5613e3c245b09c6ccad71cf3062a-JGAINE02]; Krueger, Anna [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c2b3ca3f71784b6a8d35709df4b3bdd6-Krueger, An]; Sommer, Tab [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=891a73d2bb1a4d6a8a7727f05ec50161-TTESNAU]; Pease, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3853cbe6e34644309fe19981dbdf3716-Pease, Michael]; Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]; Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Welles, Laura [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d12d5767a8634f48935d8aa59f93d4f6-Welles, Lau]; Leitch, Sharon [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fb121e9196ea4858a7ba325b3b5e4930-Leitch, Sharon]; Everett, Adolph [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=79388de3b66e4443b5d08a43e5f2c2e3-Everett, Adolph]; Butler, Elizabeth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e12e63bc32a4a91940c3fe22537601a-Butler, Elizabeth]; McGoldrick, Catherine [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5600cb0bd0084f0e9375a305b653f42d-McGoldrick,]; Housley, Denise [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3dcb34d4153b4dc7a8f0bc3e60bafa1f-Housley, Sharon]; Anderson, Meredith [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2cd9109bbf3c4818b0e1d333b8652278-Anderson, Meredith]; Setnicar, Mary [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b4cedae7b8aa4f3b968d7a6a40de75ec-MSetnica]; Fruitwala, Kishor [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a19009ba86a4236b97131d5d16f2fae-Fruitwala, Kishor]; Murrow, Patricia [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=129f9f814ea04bc08b120e55ccbc94e2-MURROW, PATRICIA]; Newland, Jesse [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fe4df5f2ee47461e85d6327498f39c2f-Newland, Je]; Gross, Barbara [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0251d038d28d452aad788de5f8c4d736-BGROSS]; Olson, Lisa

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 [/o=ExchangeLabs/ou=Exchange Administrative Group
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 [/o=ExchangeLabs/ou=Exchange Administrative Group
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 [/o=ExchangeLabs/ou=Exchange Administrative Group
 (FYDIBOHF23SPDLT)/cn=Recipients/cn=738cd1b72d6c442cbbfef35206527df4-EEBY]
CC: Mooney, Charlotte [Mooney.Charlotte@epa.gov]; Page, Jeffrey [Page.Jeffrey@epa.gov]; Sanders-Curry, Madison
 [sanders-curry.madison@epa.gov]; Wicher, Frances [Wicher.Frances@epa.gov]; McCullough, Barbara
 [McCullough.Barbara@epa.gov]; Cruz, Amanda [cruz.amanda@epa.gov]; Ruelas, Cynthia
 [RUELAS.CYNTHIA@EPA.GOV]; Zabaneh, Mahfouz [Zabaneh.Mahfouz@epa.gov]; Zabaneh, Mahfouz
 [/o=ExchangeLabs/ou=Exchange Administrative Group
 (FYDIBOHF23SPDLT)/cn=Recipients/cn=699be382a29f49d481cfa9e02719acf7-MZABANEH]; Ruelas, Cynthia
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 Frances [/o=ExchangeLabs/ou=Exchange Administrative Group
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 Madison]; Page, Jeffrey [/o=ExchangeLabs/ou=Exchange Administrative Group
 (FYDIBOHF23SPDLT)/cn=Recipients/cn=dc7d50d9100a47f4952ed0c042c4a10f-Page, Jeffrey]; Mooney, Charlotte
 [/o=ExchangeLabs/ou=Exchange Administrative Group
 (FYDIBOHF23SPDLT)/cn=Recipients/cn=74344eb699144ed98c9afaaf63139307-CMOONEY]

Attachments: HTMR furnaces reclaiming zinc.docx

Start: 8/16/2017 3:30:00 PM

End: 8/16/2017 4:30:00 PM

Recurrence: (none)

Updating with agenda.

RCRA Permit Integrity Team (PIT) Conference Call

ED_002099_0009775-00002

Call-in Number: [REDACTED]

Please contact me if you have questions or want to add items to the agenda.

AGENDA

1. **Outcome of the PIT discussion at the RCRA Branch Chiefs Meeting last week**
(Updated Issue Papers available in [REDACTED])
2. **Additional type of thermal unit for PIT consideration under existing TDU proposal**



HTMR furnaces
reclaiming zinc.d...

Message

From: Galbraith, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0ABF7F5C1A5E462E8096CB58EF9757EB-MGALBRAI]
Sent: 12/15/2016 4:50:58 PM
To: Elliott, Ross [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33cb08013cc94c21a3e3236dbad4c4a4-REELLIOT]; Kaps, Melissa [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2fd9ca1cc4f145df83c8bdd2b683a290-mkaps]; Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]
CC: Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]
Subject: FW: Tradebe Information Request Letter
Attachments: Information Request letter.pdf

From: Lee, Jae
Sent: Thursday, December 15, 2016 10:59 AM
To: Cunningham, Michael <cunningham.michael@epa.gov>; Valentino, Michael <Valentino.Michael@epa.gov>; Chow, Kevin <chow.kevin@epa.gov>; Galbraith, Michael <Galbraith.Michael@epa.gov>
Cc: John Naddy <jnaddy@idem.in.gov>; rjean@idem.in.gov
Subject: FW: Tradebe Information Request Letter

FYI

From: Lee, Jae
Sent: Thursday, December 15, 2016 9:57 AM
To: 'tita.lagrimas@tradebe.com' <tita.lagrimas@tradebe.com>
Cc: 'SCHROER, CRAIG' <CSCHROER@idem.IN.gov>; Setnicar, Mary <setnicar.mary@epa.gov>
Subject: Tradebe Information Request Letter

Tita,

The information request letter for Tradebe is attached.

If you need an original letter and/or word-version of the letter, please let me know.

Jae Lee
RCRA/Tsca Section
EPA Region 5
312-886-3781



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 15 2016

REPLY TO THE ATTENTION OF:

Tita Lagrimas
Executive Vice President of Regulatory Affairs
Tradebe Treatment and Recycling, LLC
1433 East 83rd Avenue, Suite 200
Merrillville, Indiana 46410
tita.lagrimas@tradebe.com

Re: Request for Information
Tradebe Treatment and Recycling, LLC
East Chicago, Indiana, IND 000 646 943

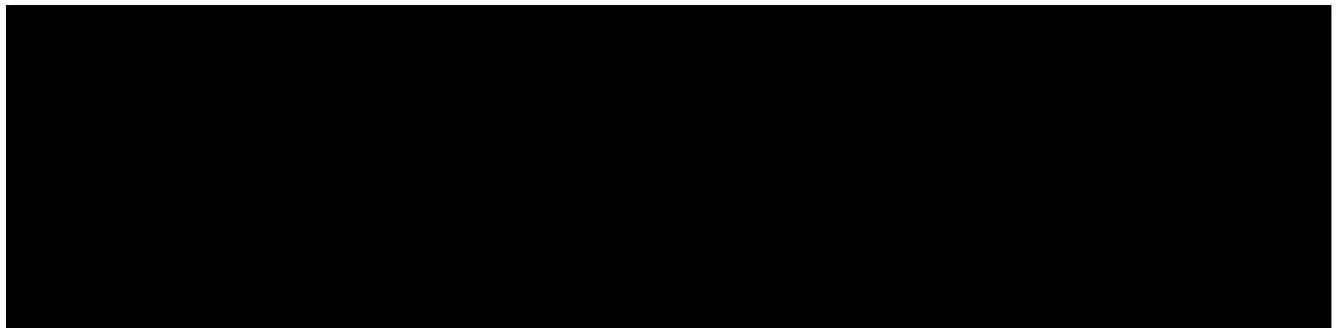
Dear Ms. Lagrimas:


The U.S. Environmental Protection Agency, Region 5 is in the process of consulting with EPA Headquarters regarding the exemption status of the Solids Distillation System (SDS) operated by Tradebe Treatment and Recycling, LLC (Tradebe), at the facility located at 4343 Kennedy Avenue in East Chicago, Indiana (Facility), under the Resource Conservation and Recovery Act (RCRA).

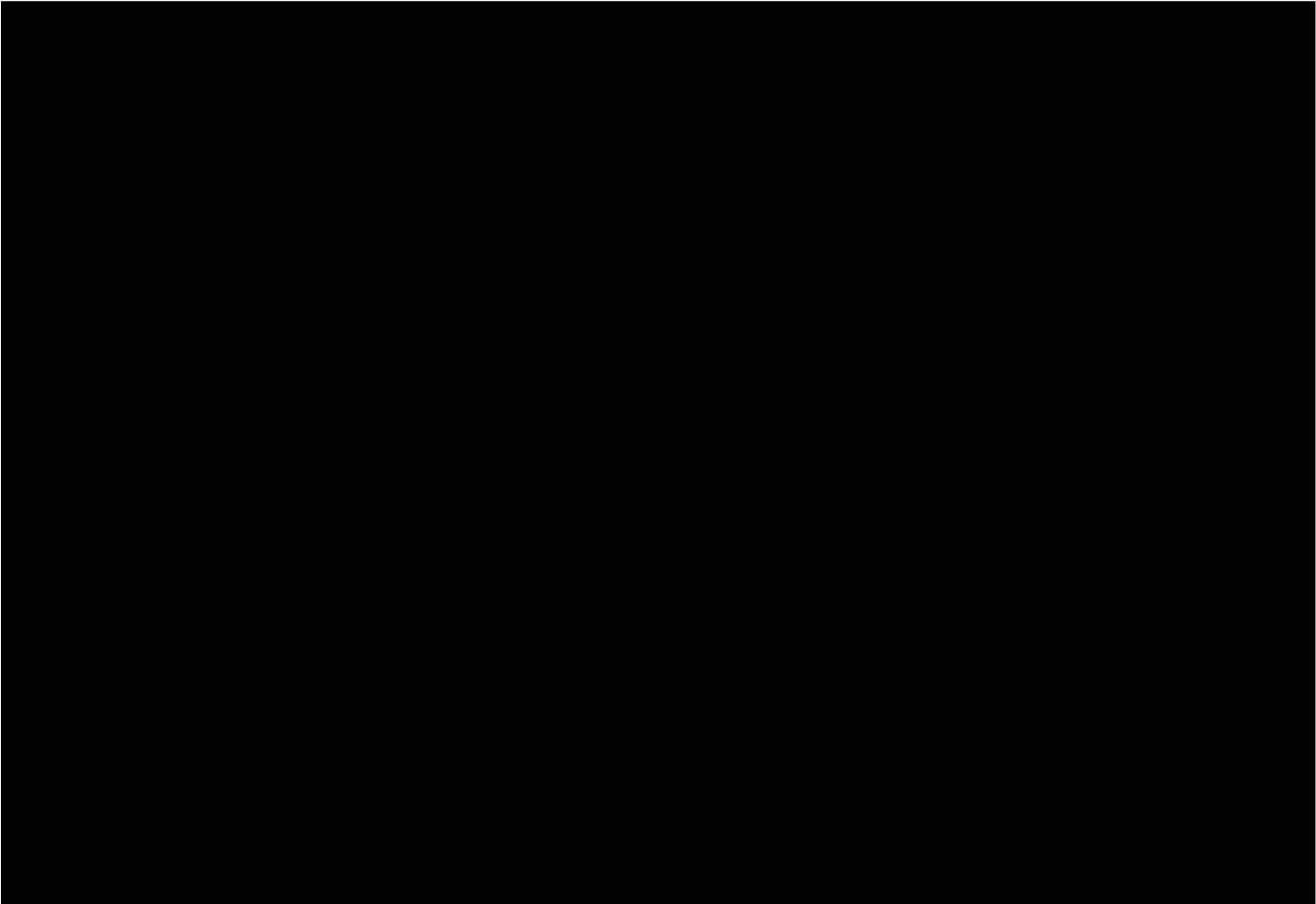
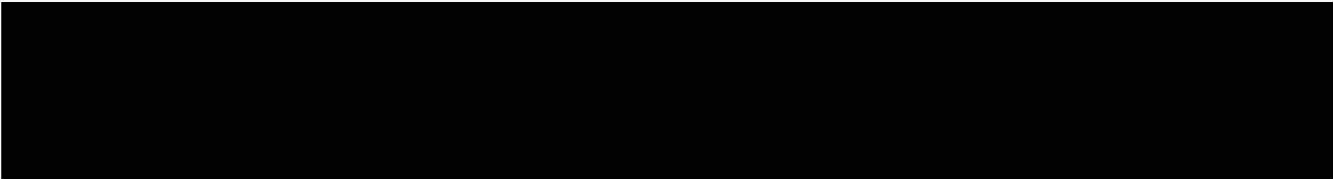
We have reviewed the SDS-related information previously provided by Tradebe by letter dated October 18, 2016, pertaining to this issue.

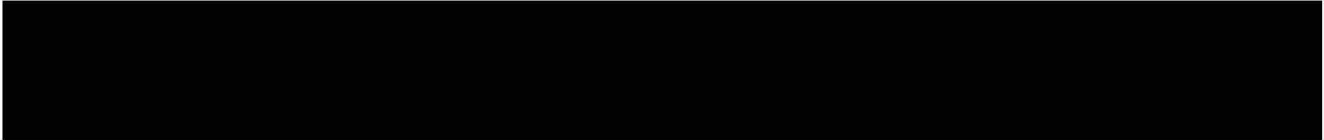
Based on our review of the October 18, 2016 information, EPA Region 5 is requesting additional data and information relating to process operations and hazardous waste activities at the Facility.

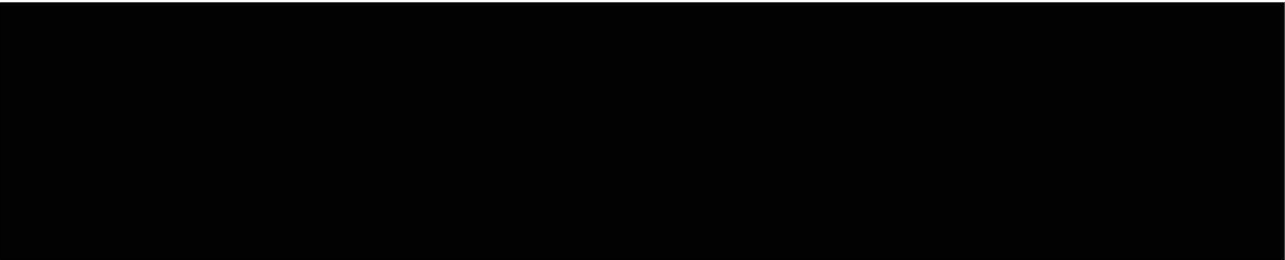
Please respond separately to each of the questions listed below. For each Request asking for mean and maximum values, please respond on the basis of hourly rates for each of the five calendar years 2011 through 2015.



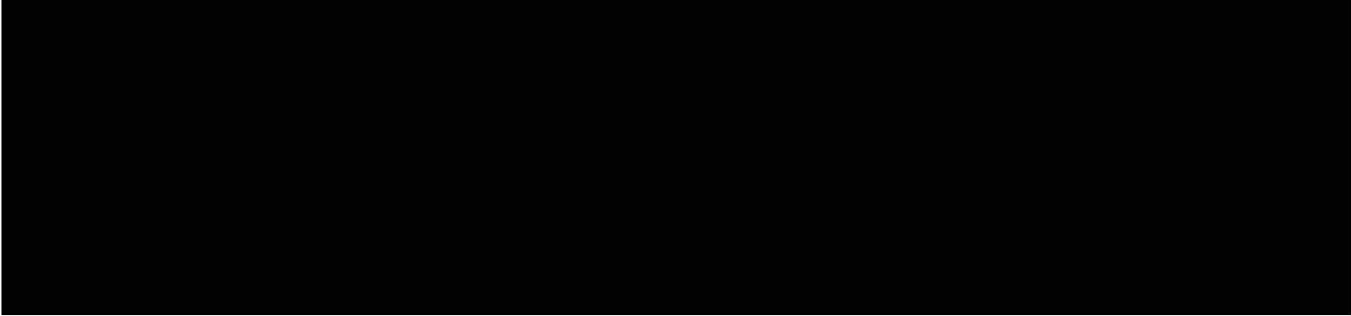

- 
7. The following pertain to the carbon beds downstream of the shredder and upstream of the two-inch by two-inch metals screen; immediately following the oil-water separator (OWS) downstream of the vapor recovery unit (VRU); and the carbon bed which serves as a back-up to the VRU when the flare is bypassed. For each carbon bed, provide: (i) diameter and depth of carbon bed; (ii) adsorption isotherms (from vendor); (iii) mean and maximum hydrocarbon concentrations at the inlet; (iv) mean and maximum hydrocarbon concentrations at breakthrough; (v) mean and maximum volumetric air flowrate into the carbon bed; (vi) mean and maximum air temperature into the carbon bed; (vii) means by which breakthrough is monitored, including typical breakthrough set point; and (viii) frequency of bed change-out.
 8. Describe the various types of waste streams, liquid, solid or otherwise, that are introduced to the SDS, typical sources of these wastes and the most common types of hydrocarbons (e.g., spent solvents including toluene, xylene, etc.) that are fed into the SDS.

- 
16. Does start-up and shut-down of the SDS process occur when waste is in the system or only when alternative fuel is used? If Tradebe does not use “clean start-up” (i.e., only when natural gas or fuel oil or other non-waste derived fuel is being used), provide a percentage of time dedicated to start-up/shut-down of the overall time the SDS is in operation.
- 


18. What is the destruction and removal efficiency (DRE) of the flare? How does Tradebe ensure this DRE is maintained? What measures are taken when the DRE falls below its permit-allowable DRE? What is the design capacity of the flare?
- 



21. In the process flow diagram referred to in Request 1 Tradebe shows a sludge stream from the sludge discharge tanker. What is the hydrocarbon content of this stream? How is this stream managed?



24. For the solvent degreaser referred to in Request 23, provide product specifications and Material Safety Data Sheets for same. Also, identify any comparable products available to end users for sale from other markets.



26. For the SDS fuels discussed in Request 25, what further blending and/or processing do they undergo once they are trucked away from the SDS? What are the minimum acceptance criteria by Essroc Cement Corporation, Cadence Environmental Energy and any other end-user of Tradebe's blended fuels?

Your cooperation and response for this matter is highly appreciated. Please provide your response to:

U.S. Environmental Protection Agency, Region 5
Attention: Jae Lee
77 West Jackson Boulevard
Mail Code LR-8J
Chicago, Illinois 60604

You may, under 40 C.F.R. Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 C.F.R. § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 C.F.R. Part 2, B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it does not seek collection of information from 10 or more persons.

If you have any questions in this matter, please contact Mr. Jae Lee, of my staff, at (312) 886-3781.

Sincerely,



Mary Setnicar, Chief
RCRA/TSCA Programs Section
RCRA Branch

cc: Craig Schroer, Indiana Department of Environmental Management (cschroer@idem.IN.gov)

Message

Sent: 7/12/2018 7:07:56 PM
To: Toups, Brad [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f79bc386bf8c4ab681f4e156b456d9a5-Toups, Brad]; Fruitwala, Kishor [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a19009ba86a4236b97131d5d16f2fae-Fruitwala, Kishor]; Tidmore, Guy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e9af087a1ce4703b25a4a8e6fa048dd-Tidmore, Guy]; Robinson, Jeffrey [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5c2955a5bab44049baa34b80783864ef-Robinson, Jeffrey]
CC: Luscek, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cd6769c1089e464ebe6e5f345960a0cf-Luscek, Robert]; Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]
Subject: RE: Thermaldyne

Mike Galbraith
Permits Branch (5303P)
Program Implementation/Information Division
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

(703) 605-0567

From: Toups, Brad
Sent: Thursday, July 12, 2018 9:26 AM
To: Fruitwala, Kishor <Fruitwala.Kishor@epa.gov>; Tidmore, Guy <tidmore.guy@epa.gov>; Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>
Cc: Luscek, Robert <Luscek.Robert@epa.gov>; Atagi, Tracy <Atagi.Tracy@epa.gov>; Galbraith, Michael <Galbraith.Michael@epa.gov>
Subject: RE: Thermaldyne

[REDACTED] Craig Lutz was the investigator on that but he is at NEIC now. There were also I believe two other TDUs down in the Houston area.
Brad

From: Fruitwala, Kishor
Sent: Wednesday, July 11, 2018 11:31 AM
To: Tidmore, Guy <tidmore.guy@epa.gov>; Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>; Toups, Brad <Toups.Brad@epa.gov>
Cc: Luscek, Robert <Luscek.Robert@epa.gov>; Atagi, Tracy <Atagi.Tracy@epa.gov>; Galbraith, Michael <Galbraith.Michael@epa.gov>
Subject: FW: Thermaldyne

Additional Air permit information for Thermaldyne operation.

Thanks

Kishor

From: Luschek, Robert

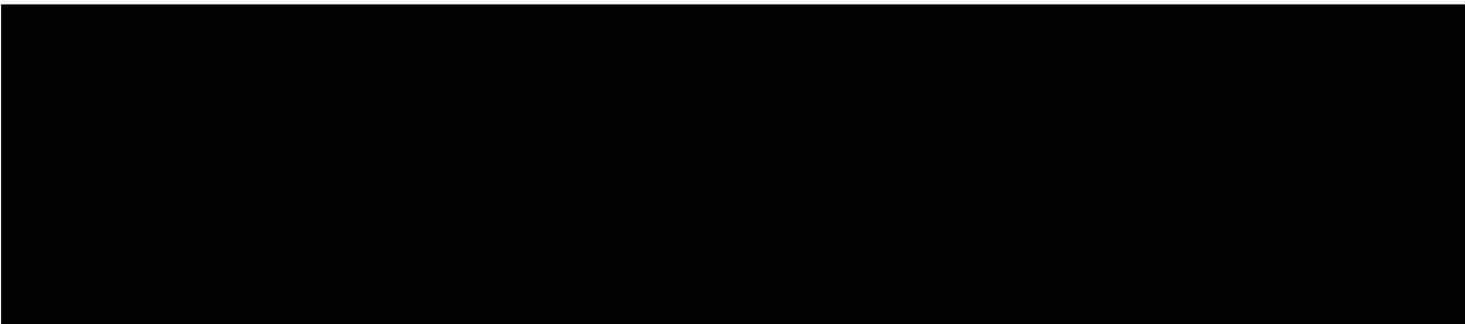
Sent: Wednesday, July 11, 2018 10:04 AM

To: Fruitwala, Kishor <Fruitwala.Kishor@epa.gov>; Peace, Michelle <Peace.Michelle@epa.gov>; Shah, Harry <Shah.Harry@epa.gov>

Subject: FW: Thermaldyne

Hi folks,

In response to a phone conversation I had with Nora on Thursday of last week to clarify what air emissions were coming from the TDU, she sent me the email below. Attached is an Updated Flow Diagram for Thermaldyne. The air emissions from the Natural Gas Fired Outer Shell of the TDU will proceed to the Thermal Oxidizer. The air/gases from inside the TDU will proceed to the VRU and then onto the Thermal Oxidizer.



Let me know if you have any additional questions. Thanks!

Rob Luschek

Environmental Engineer

U.S. EPA Region 6 (6MM-RP)

214-665-7148

luschek.robert@epa.gov

From: Nora Lane [<mailto:Nora.Lane@LA.GOV>]

Sent: Wednesday, July 11, 2018 8:24 AM

To: Luschek, Robert <Luschek.Robert@epa.gov>

Subject: RE: Thermaldyne

Good morning Rob,

Sorry for the delay getting back to you.

The emission stream on the Figure 4, that shows it venting to the atmosphere, is not correct, and is being revised. The stream from the goes either to the Vapor Recovery Unit, and/or to the thermal oxidizer.

There is a permit modification in house to modify their air permit to account for design changes, and includes this emission point.

I've attached the revised 4. If you want to take a look at the air permit modification, it is located at [EDMS Doc](#)

Id: 11193472

<http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=11193472&ob=yes&child=yes>

On Page 8 of 202, there is the discussion of the desorbed vapors from the indirectly fired kiln (TDU); these vapors go back to the Vapor Recovery Unit (VRU) and/or to the thermal oxidizer.

Let me know if you need additional information,

Thanks,

Nora Lane
Waste Permits Division
LA DEQ
225-219-3422

From: Luschek, Robert [<mailto:Luschek.Robert@epa.gov>]
Sent: Thursday, July 05, 2018 9:37 AM
To: Nora Lane <Nora.Lane@LA.GOV>
Subject: Thermaldyne

Hi Nora,

I just left a message for you...and then I remembered hearing that some of LDEQ got new numbers and such...so I wanted to follow up with an email.

I just wanted to talk briefly with you to make sure we had all the info on Thermaldyne and their VRF Application. They asked if they could have a technical discussion with us, and it's my understanding that you all are meeting with them on Tuesday next week. So we wanted to make sure that we had the complete picture of what was being proposed at the site now.

I'm actually working from home today, but I forgot to forward my office phone...so if you could give me a call at [REDACTED] that'd be great.

Thanks!

Rob Luschek
Environmental Engineer
U.S. EPA Region 6 (6MM-RP)
214-665-7148
luschek.robert@epa.gov

Message

From: Toups, Brad [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f79bc386bf8c4ab681f4e156b456d9a5-Toups, Brad]
Sent: 7/12/2018 1:26:03 PM
To: Fruitwala, Kishor [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a19009ba86a4236b97131d5d16f2fae-Fruitwala, Kishor]; Tidmore, Guy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e9af087a1ce4703b25a4a8e6fa048dd-Tidmore, Guy]; Robinson, Jeffrey [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5c2955a5bab44049baa34b80783864ef-Robinson, Jeffrey]
CC: Luscheck, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cd6769c1089e464e6e5f345960a0cf-Luscheck, Robert]; Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]; Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]
Subject: RE: Thermaldyne

[REDACTED]

From: Fruitwala, Kishor
Sent: Wednesday, July 11, 2018 11:31 AM
To: Tidmore, Guy ; Robinson, Jeffrey ; Toups, Brad
Cc: Luscheck, Robert ; Atagi, Tracy ; Galbraith, Michael
Subject: FW: Thermaldyne

Additional Air permit information for Thermaldyne operation.

Thanks

Kishor


From: Luscheck, Robert
Sent: Wednesday, July 11, 2018 10:04 AM
To: Fruitwala, Kishor <Fruitwala.Kishor@epa.gov>; Peace, Michelle <Peace.Michelle@epa.gov>; Shah, Harry <Shah.Harry@epa.gov>
Subject: FW: Thermaldyne

Hi folks,

In response to a phone conversation I had with Nora on Thursday of last week to clarify what air emissions were coming from the TDU, she sent me the email below. Attached is an Updated Flow Diagram for Thermaldyne. [REDACTED]

[REDACTED]

[REDACTED]



Let me know if you have any additional questions. Thanks!

Rob Luschek
Environmental Engineer
U.S. EPA Region 6 (6MM-RP)
214-665-7148
luschek.robert@epa.gov

From: Nora Lane [<mailto:Nora.Lane@LA.GOV>]
Sent: Wednesday, July 11, 2018 8:24 AM
To: Luschek, Robert <Luschek.Robert@epa.gov>
Subject: RE: Thermaldyne

Good morning Rob,

Sorry for the delay getting back to you.

The emission stream on the Figure 4, that shows it venting to the atmosphere, is not correct, and is being revised. The stream from the goes either to the Vapor Recovery Unit, and/or to the thermal oxidizer.

There is a permit modification in house to modify their air permit to account for design changes, and includes this emission point.

I've attached the revised 4. If you want to take a look at the air permit modification, it is located at **EDMS Doc Id:** [11193472](http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=11193472&ob=yes&child=yes)
<http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=11193472&ob=yes&child=yes>

On Page 8 of 202, there is the discussion of the desorbed vapors from the indirectly fired kiln (TDU); these vapors go back to the Vapor Recovery Unit (VRU) and/or to the thermal oxidizer.

Let me know if you need additional information,

Thanks,

Nora Lane
Waste Permits Division
LA DEQ
225-219-3422

From: Luschek, Robert [<mailto:Luschek.Robert@epa.gov>]
Sent: Thursday, July 05, 2018 9:37 AM
To: Nora Lane <Nora.Lane@LA.GOV>
Subject: Thermaldyne

Hi Nora,

I just left a message for you.and then I remembered hearing that some of LDEQ got new numbers and such.so I wanted to follow up with an email.

I just wanted to talk briefly with you to make sure we had all the info on Thermaldyne and their VRF Application. They asked if they could have a technical discussion with us, and it's my understanding that you all are meeting with them on Tuesday next week. So we wanted to make sure that we had the complete picture of what was being proposed at the site now.

I'm actually working from home today, but I forgot to forward my office phone.so if you could give me a call at [REDACTED] that'd be great.

Thanks!

Rob Luschek
Environmental Engineer
U.S. EPA Region 6 (6MM-RP)
214-665-7148
luschek.robert@epa.gov

■

Message

From: Fruitwala, Kishor [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a19009ba86a4236b97131d5d16f2fae-Fruitwala, Kishor]
Sent: 7/11/2018 4:30:45 PM
To: Tidmore, Guy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e9af087a1ce4703b25a4a8e6fa048dd-Tidmore, Guy]; Robinson, Jeffrey [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5c2955a5bab44049baa34b80783864ef-Robinson, Jeffrey]; Toups, Brad [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f79bc386bf8c4ab681f4e156b456d9a5-Toups, Brad]
CC: Luschek, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cd6769c1089e464ebe6e5f345960a0cf-Luschek, Robert]; Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]; Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]
Subject: FW: Thermaldyne
Attachments: B14798-04_Process_Flow_Diagram.pdf

Additional Air permit information for Thermaldyne operation.

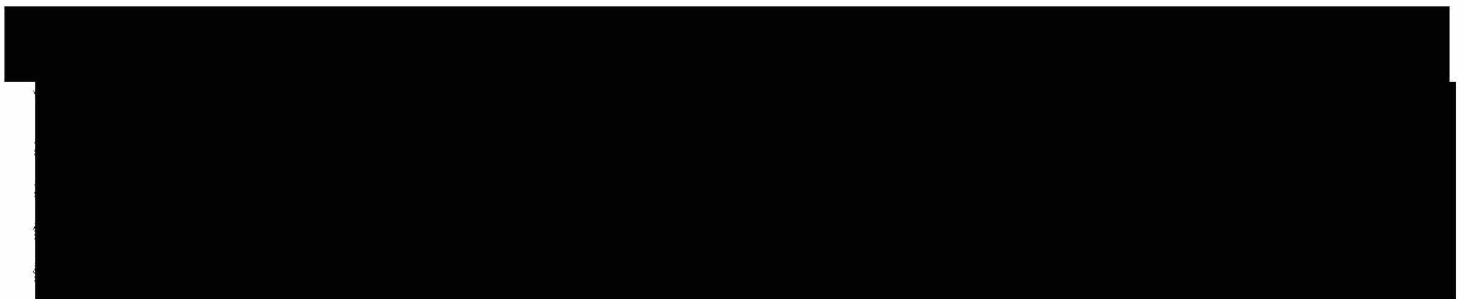
Thanks

Kishor

From: Luschek, Robert
Sent: Wednesday, July 11, 2018 10:04 AM
To: Fruitwala, Kishor ; Peace, Michelle ; Shah, Harry
Subject: FW: Thermaldyne

Hi folks,

In response to a phone conversation I had with Nora on Thursday of last week to clarify what air emissions were coming from the TDU, she sent me the email below. Attached is an Updated Flow Diagram for Thermaldyne. The air emissions from the Natural Gas Fired Outer Shell of the TDU will proceed to the Thermal Oxidizer. The air/gases from inside the TDU will proceed to the VRU and then onto the Thermal Oxidizer.



Let me know if you have any additional questions. Thanks!

Rob Luschek
Environmental Engineer
U.S. EPA Region 6 (6MM-RP)
214-665-7148

luschek.robert@epa.gov

From: Nora Lane [<mailto:Nora.Lane@LA.GOV>]
Sent: Wednesday, July 11, 2018 8:24 AM
To: Luschek, Robert <Luschek.Robert@epa.gov>
Subject: RE: Thermaldyne

Good morning Rob,

Sorry for the delay getting back to you.

The emission stream on the Figure 4, that shows it venting to the atmosphere, is not correct, and is being revised. The stream from the goes either to the Vapor Recovery Unit, and/or to the thermal oxidizer.

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<http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=11193472&ob=yes&child=yes>

On Page 8 of 202, there is the discussion of the desorbed vapors from the indirectly fired kiln (TDU); these vapors go back to the Vapor Recovery Unit (VRU) and/or to the thermal oxidizer.

Let me know if you need additional information,

Thanks,

Nora Lane
Waste Permits Division
LA DEQ
225-219-3422

From: Luschek, Robert [<mailto:Luschek.Robert@epa.gov>]
Sent: Thursday, July 05, 2018 9:37 AM
To: Nora Lane <Nora.Lane@LA.GOV>
Subject: Thermaldyne

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I'm actually working from home today, but I forgot to forward my office phone.so if you could give me a call at [REDACTED] that'd be great.

Thanks!

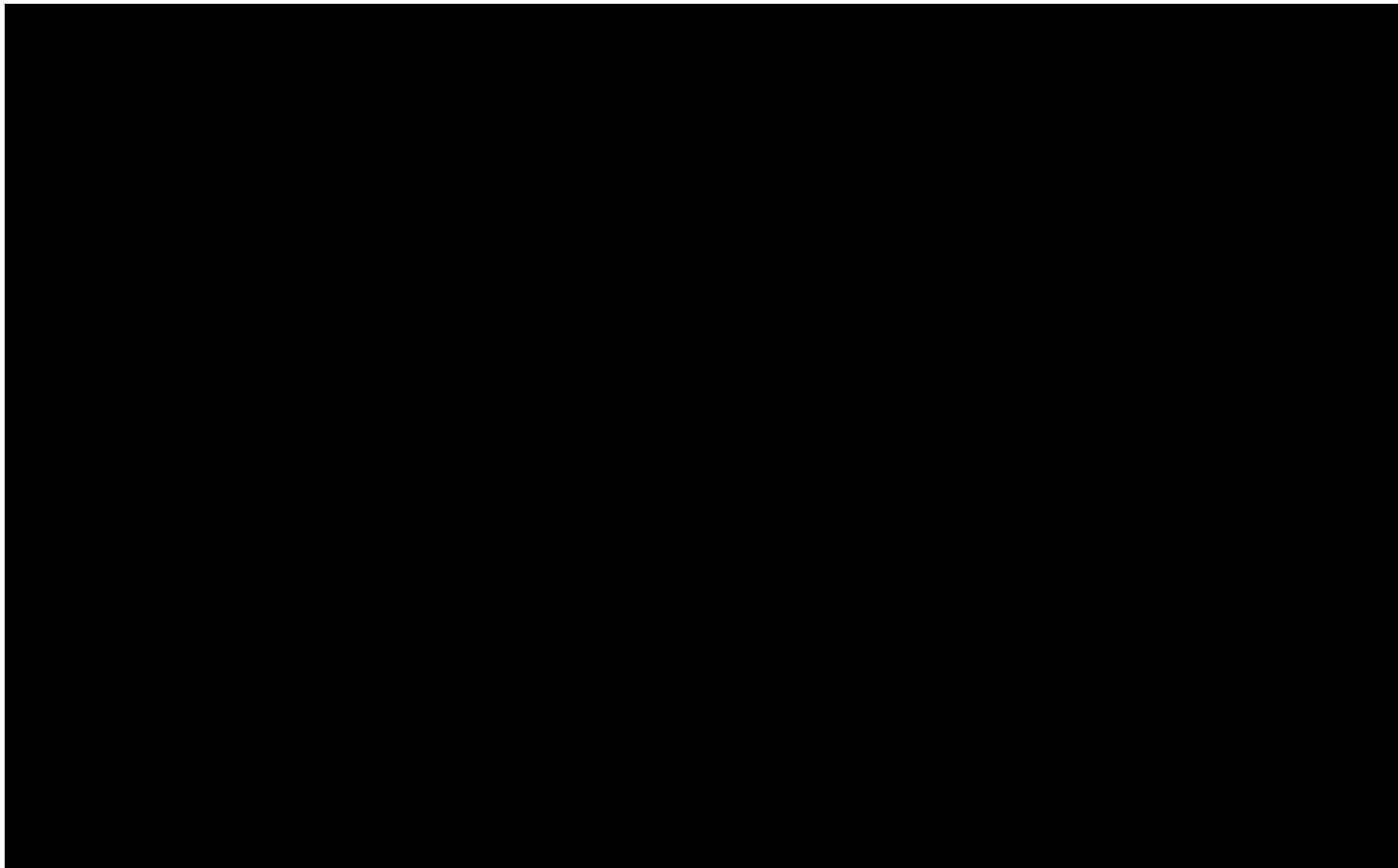
ED_002099_0009788-00002

Rob Luschek
Environmental Engineer
U.S. EPA Region 6 (6MM-RP)
214-665-7148
luschek.robert@epa.gov

Message

From: Elliott, Ross [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33cb08013cc94c21a3e3236dbad4c4a4-REELLIOT]
Sent: 7/3/2018 2:13:34 PM
To: Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]
CC: Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]; Stanley, Laura [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6151acac03b246d9820aaee6d0dfcdab-Stanley, La]; Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]
Subject: Today's call w/ R6

Only R6 is on the call with us. Thanks for listening in today. A couple quick points:



Appointment

From: Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]
Sent: 7/3/2018 1:43:34 PM
To: Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]
Subject: FW: Thermaldyne
Attachments: Thermaldyne draft Exec Summary 07022018 v3.doc
Location: 7th Flr., Little Rock Conf. Rm.
Start: 7/3/2018 4:00:00 PM
End: 7/3/2018 5:00:00 PM
Show Time As: Tentative

-----Original Appointment-----

From: McGee, Tomika
Sent: Tuesday, July 03, 2018 9:41 AM
To: McGee, Tomika; Stenger, Wren; Seager, Cheryl; Fruitwala, Kishor; Gilrein, Stephen; Potts, Mark; Przyborski, Jay; Shah, Harry; Patterson, Alima; Tidmore, Guy; Pearson, Evan; Peace, Michelle; Jones, Bruce; Luschek, Robert
Cc: Elliott, Ross; Stanley, Laura; Roepe, Wayne; Young, Jessica; Kohler, Amanda; Atagi, Tracy
Subject: FW: Thermaldyne
When: Tuesday, July 03, 2018 11:00 AM-12:00 PM (UTC-06:00) Central Time (US & Canada).
Where: 7th Flr., Little Rock Conf. Rm.

We will be in 6671.

-----Original Appointment-----

From: McGee, Tomika
Sent: Monday, July 2, 2018 5:35 PM
To: McGee, Tomika; Stenger, Wren; Seager, Cheryl; Fruitwala, Kishor; Gilrein, Stephen; Potts, Mark; Przyborski, Jay; Shah, Harry; Patterson, Alima; Tidmore, Guy; Pearson, Evan; Peace, Michelle; Jones, Bruce; Luschek, Robert
Cc: Elliott, Ross; Stanley, Laura; Roepe, Wayne; Young, Jessica; Atagi, Tracy
Subject: FW: Thermaldyne
When: Tuesday, July 3, 2018 11:00 AM-12:00 PM (UTC-06:00) Central Time (US & Canada).
Where: 7th Flr., Little Rock Conf. Rm.

Hi All,

[REDACTED]

[REDACTED]

Thank you.

Kishor

Kishor Fruitwala, Ph.D., P.E.
Acting Associate Director for RCRA
Multimedia Division, EPA Region 6
214-665-6669

-----Original Appointment-----

From: McGee, Tomika

Sent: Thursday, June 28, 2018 12:45 PM

To: McGee, Tomika; Stenger, Wren; Seager, Cheryl; Fruitwala, Kishor; Gilrein, Stephen; Potts, Mark; Przyborski, Jay; Shah, Harry; Patterson, Alima; Tidmore, Guy; Pearson, Evan; Peace, Michelle; Jones, Bruce; Luschek, Robert

Subject: Thermaldyne

When: Tuesday, July 03, 2018 11:00 AM-12:00 PM (UTC-06:00) Central Time (US & Canada).

Where: 7th Flr., Little Rock Conf. Rm.

Message

From: Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]
Sent: 7/17/2018 6:17:59 PM
To: Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]
Subject: Re: 3:00 thermaldyne meeting

[REDACTED]

Mike Galbraith
Permits Branch (5303P)
Program Implementation/Information Division
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

From: Kohler, Amanda
Sent: Tuesday, July 17, 2018 2:13 PM
To: Galbraith, Michael
Subject: RE: 3:00 thermaldyne meeting

Great – thanks!

[REDACTED]

Amanda Kohler
703-347-8975

From: Galbraith, Michael
Sent: Tuesday, July 17, 2018 1:48 PM
To: Kohler, Amanda <Kohler.Amanda@epa.gov>
Subject: 3:00 thermaldyne meeting

you don't need to go to the 3:00 meeting [REDACTED]


[REDACTED]

Mike Galbraith
Permits Branch (5303P)
Program Implementation/Information Division
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Message

From: Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]
Sent: 7/17/2018 5:48:05 PM
To: Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]
Subject: 3:00 thermaldyne meeting

you don't need to go to the 3:00 meeting



Mike Galbraith
Permits Branch (5303P)
Program Implementation/Information Division
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Message

From: Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]
Sent: 7/17/2018 12:21:31 PM
To: Valdez, Heather [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=eb323347294d44009a369c3576798bdf-Valdez, Heather]; Fruitwala, Kishor [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a19009ba86a4236b97131d5d16f2fae-Fruitwala, Kishor]; Tidmore, Guy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e9af087a1ce4703b25a4a8e6fa048dd-Tidmore, Guy]
CC: Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]; Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]
Subject: Re: Hazardous Waste Thermal Desorption

[REDACTED]

I think the next best step would be to have a conference call to discuss all this - [REDACTED]

[REDACTED]

Mike Galbraith
Permits Branch (5303P)
Program Implementation/Information Division
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

From: Valdez, Heather
Sent: Monday, July 16, 2018 6:32 PM
To: Galbraith, Michael; Fruitwala, Kishor; Tidmore, Guy
Subject: Fw: Hazardous Waste Thermal Desorption

Hi Mike, Kishor and Guy, how are you? Can you help me to understand something better. We have been looking at a system at a Chem Waste facility in OR. You might recall us talking to you about it, Mike. [REDACTED]

[REDACTED]

[REDACTED]

Thanks!

Heather Valdez
RCRA Corrective Action and Permitting Project Manager
1200 6th Ave, AWT-150
Seattle WA, 98101
206-553-6220
valdez.heather@epa.gov

From: Castrilli, Laura
Sent: Monday, July 16, 2018 10:07 AM
To: Valdez, Heather
Cc: Knittel, Janette; McArthur, Lisa
Subject: FW: Hazardous Waste Thermal Desorption

Laura Castrilli
(206) 553-4323; castrilli.laura@epa.gov
Office of Air and Waste
EPA Region 10; 1200 Sixth Ave., Suite 155 MS AWT-150; Seattle, WA 98101

From: Hamlin, Tim
Sent: Monday, July 16, 2018 9:35 AM
To: McArthur, Lisa <McArthur.Lisa@epa.gov>; Castrilli, Laura <Castrilli.Laura@epa.gov>
Subject: FW: Hazardous Waste Thermal Desorption

Hi, when appropriate, I'd like to be briefed on this issue and, in any event, would like to reply to Andrew regarding his request to meet.

From: Andrew Marshall [<mailto:andrew.marshall@usecology.com>]
Sent: Saturday, July 14, 2018 9:46 AM
To: Hamlin, Tim <Hamlin.Tim@epa.gov>
Subject: Hazardous Waste Thermal Desorption

Tim,

I hope all is going well in Seattle. I want to express my appreciation of your teams efforts on getting our TSCA permit renewed. It sounds like our Grand View, Idaho facility and your team are working well together to get this renewal knocked out. Thank you.

When we were together a few months ago, I raised an issue that US Ecology has been deeply involved in trying to ensure there is national consistency on the regulatory requirements for thermal desorption technology used for the treatment of hazardous waste. There is a thermal desorption unit owned and operated by Waste Management in Oregon that we recently discovered is expanding its operation and submitted a RCRA permit

modification with the State of Oregon. US Ecology in conjunction with our partner TDX Associates will be submitting comments to Oregon DEQ by the close of the comment period next week. We will cc you on our email submission of comments to ODEQ.

It appears that there has been no consideration for the EPA's extensive review of this technology and resulting interpretation of the regulations which is necessary in establishing necessary operating parameters and emission requirements for this operation. This has us concerned with the direction of the project and the establishment of consistent regulatory interpretations. EPA's position originated in Region 6 as a result of an enforcement action brought against our company. We agree with EPA's interpretation and have been working closely with EPA Region 6 and EPA headquarters staff to ensure EPA's position is consistently applied.

I have included two background documents. One is a May 2, 2016 letter from EPA that discusses the how the vent gasses from a thermal desorption unit operating under the same regulatory provision that Waste Management is proposing to operate under should be regulated under RCRA. The second attachment is a letter dated June 24, 2016 from EPA to the State of Louisiana addressing the same requirements for an identical unit that is being constructed at Waste Management's facility in Carlyss, Louisiana. Waste Management agreed to comply with these requirements in the permit that was issued for their Louisiana facility.

We have found that the many State agencies processing these permits may not be fully aware of EPA's regulatory position and generally have limited experience in permitting hazardous waste operations that include thermal destruction. We would appreciate Region 10's support in working with Oregon DEQ to ensure these regulations are consistently applied. We understand that Richard Duval in ODEQ's Eastern Oregon office is taking the lead on Waste Management's permit modification request.

This treatment technology is very complex and we would appreciate the opportunity to meet with your technical staff in Seattle to discuss the details of how the thermal desorption process works and the conclusions of how EPA interpreted the regulatory requirements. We are also willing to connect your staff with the Region 6 staff that has been involved in these previous projects.

Thanks for your support.

Andrew Marshall
Executive Vice President
Regulatory Compliance and Safety


andrew.marshall@usecology.com
p: 208.319.1638 | c: 208.914.8678

Appointment

From: Galbraith, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0ABF7F5C1A5E462E8096CB58EF9757EB-MGALBRAI]
Sent: 7/17/2018 12:05:06 PM
To: Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]
Subject: Fw: Thermaldyne Technical Call - EPA only
Attachments: DSW_Fed_Reg_Final_Rule_Notice_20150113_prn.pdf; Thermaldyne Application Mod 11193472_1of6.pdf
Location: R6-ConfRm-Jaquarundi-09O15/R6---09th-Floor

Start: 7/17/2018 7:00:00 PM
End: 7/17/2018 8:30:00 PM
Show Time As: Tentative

Mike Galbraith
Permits Branch (5303P)
Program Implementation/Information Division
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

From: Fruitwala, Kishor
Sent: Monday, July 16, 2018 5:21 PM
To: Fruitwala, Kishor; Elliott, Ross; Atagi, Tracy; Young, Jessica; Galbraith, Michael; Lushek, Robert; Shah, Harry; Peace, Michelle; Potts, Mark; Tidmore, Guy; Jones, Bruce; Przyborski, Jay; Pearson, Evan; Toups, Brad; Thompson, Steve
Subject: Thermaldyne Technical Call - EPA only
When: Tuesday, July 17, 2018 3:00 PM-4:30 PM.
Where: R6-ConfRm-Jaquarundi-09O15/R6---09th-Floor

Hi All,

As discussed on the conf call today, we will have an internal call to discuss the technical/regulatory questions below.

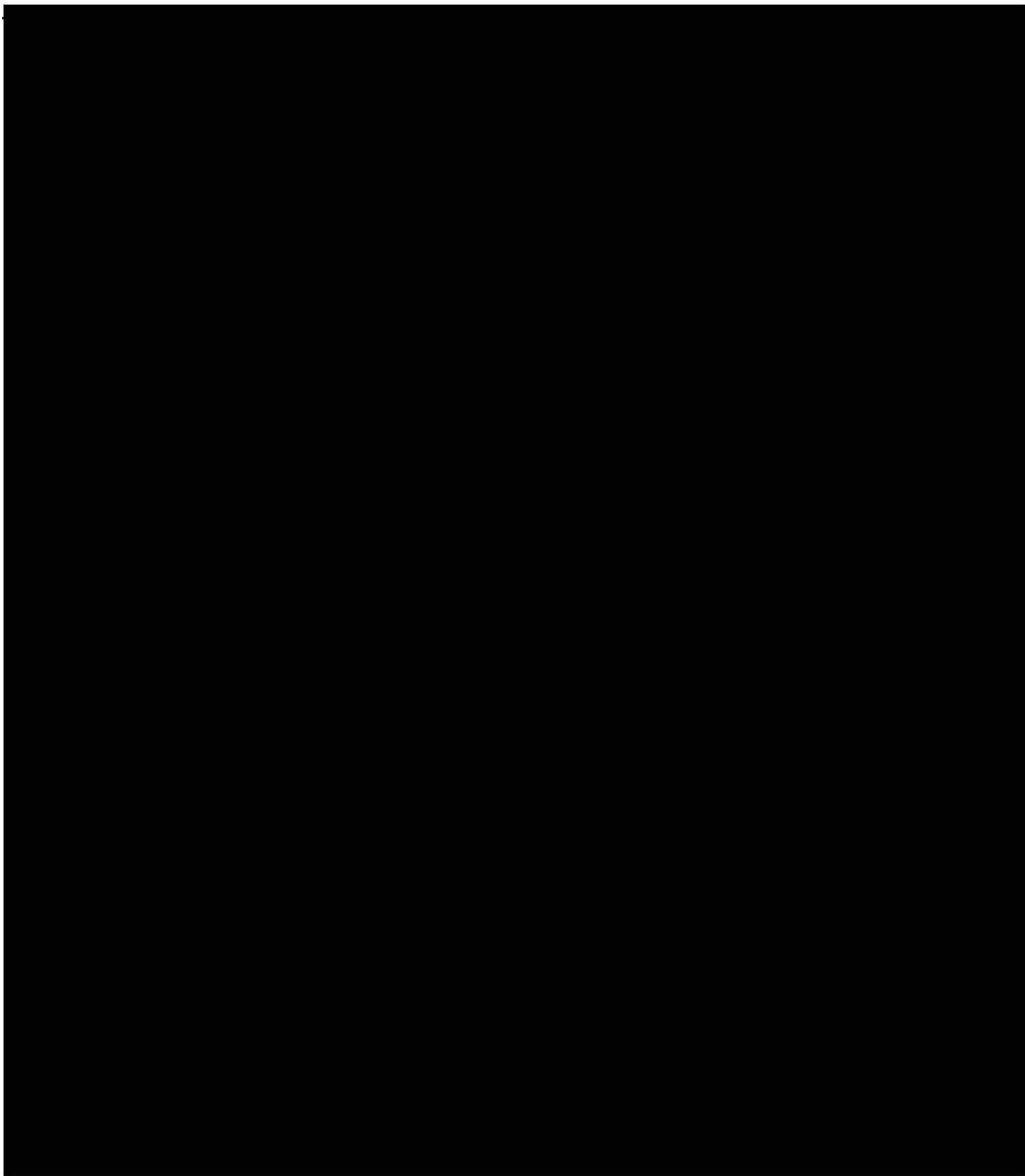
Please feel free to invite anyone I might have missed.

Thank you everyone for your support and spending time on this important project.

Kishor

Kishor Fruitwala, Ph.D., P.E.

Acting Associate Director for RCRA
Multimedia Division, EPA Region 6
214-665-6669



Appointment

From: Fruitwala, Kishor [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a19009ba86a4236b97131d5d16f2fae-Fruitwala, Kishor]
Sent: 7/10/2018 7:08:28 PM
To: Elliott, Ross [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33cb08013cc94c21a3e3236dbad4c4a4-REELLIOT]; Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]; Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]
Subject: FW: Updated Event Invitation: Thermaldyne Process Discussion
Attachments: invite.ics; 9747602_Final_air_permit_Minor_Source.pdf; 9747602_Final_air_permit_Minor_Source.pdf
Start: 7/16/2018 6:00:00 PM
End: 7/16/2018 7:30:00 PM
Show Time As: Tentative

Hi All,

US Ecology/TDX (USEC) has invited EPA to listen to their understanding of the Thermaldyne operations. Several ways of joining the call is provided below. This will be a technical call; no legal. R6 Program and EN will participate. Several Thermaldyne Variance, application and Air permit documents are shared with you via Sharepoint (a separate email/link was sent). Here is background information:

1. Following a meeting with USEC two weeks ago in Dallas, [REDACTED]

We certainly appreciate your help and support. Please contact me if you have any questions.

Thank you.

Kishor

Kishor Fruitwala, Ph.D., P.E.
Acting Associate Director for RCRA
Multimedia Division, EPA Region 6
214-665-6669

1. Go over Heat & Material Balance for Thermaldyne with and without emission limits.
Three cases: mercury, arsenic and hydrochloric acid.

2. Open discussion.

Please use the following GoToMeeting call-in. We will share PFD and H&M Balance screens, so joining meeting thru the web interface will allow you to see these on your computer. The phone number gives the best voice contact, so that is recommended.

TCEQ/EPA - US Ecology / TD*X

Please join my meeting from your computer, tablet or smartphone.

You can also dial in using your phone.
United States: + [REDACTED]

Access Code: 

Appointment

From: Carl Palmer [cpalmer@tdxassociates.com]
To: Fruitwala, Kishor [Fruitwala.Kishor@epa.gov]; Luschek, Robert [Luschek.Robert@epa.gov]; George Hay [ghay@fmtinc.com]; Gregg Meyers [gmeyers@tdxassociates.com]; shah.harry@epa.gov; Galbraith.Michael@epa.gov; Tidmore, Guy [tidmore.guy@epa.gov]

Subject: Thermaldyne Process Discussion

Start: 7/16/2018 6:00:00 PM
End: 7/16/2018 7:30:00 PM
Show Time As: Tentative

Recurrence: (none)

1. Go over Heat & Material Balance for Thermaldyne with and without emission limits.
Three cases: mercury, arsenic and hydrochloric acid.

2. Open discussion.

Please use the following GoToMeeting call-in. We will share PFD and H&M Balance screens, so joining meeting thru the web interface will allow you to see these on your computer. The phone number gives the best voice contact, so that is recommended.

TCEQ/EPA - US Ecology / TD*X

Please join my meeting from your computer, tablet or smartphone.

You can also dial in using your phone.

First GoToMeeting? Let's do a quick system check: <https://link.gotomeeting.com/system-check>

Message

From: Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]
Sent: 7/20/2018 6:38:15 PM
To: Valdez, Heather [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=eb323347294d44009a369c3576798bdf-Valdez, Heather]; Fruitwala, Kishor [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a19009ba86a4236b97131d5d16f2fae-Fruitwala, Kishor]; Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]
CC: Tidmore, Guy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e9af087a1ce4703b25a4a8e6fa048dd-Tidmore, Guy]; Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]; Elliott, Ross [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33cb08013cc94c21a3e3236dbad4c4a4-REELLIOT]; Knittel, Janette [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a955f914e8d34cb19b6f63ac60707d32-Knittel, Janette]; McArthur, Lisa [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=524660efbdb140e7868646d8073f0c72-McArthur, Lisa]
Subject: Re: Hazardous Waste Thermal Desorption

[REDACTED]

Conference ID: [REDACTED]

From: Valdez, Heather
Sent: Friday, July 20, 2018 2:37 PM
To: Fruitwala, Kishor; Galbraith, Michael; Young, Jessica
Cc: Tidmore, Guy; Kohler, Amanda; Elliott, Ross; Atagi, Tracy; Knittel, Janette; McArthur, Lisa
Subject: Re: Hazardous Waste Thermal Desorption

Very sorry we need a larger phone line, Tracy is sending that out now

Heather Valdez
RCRA Corrective Action and Permitting Project Manager
1200 6th Ave, AWT-150
Seattle WA, 98101
206-553-6220
valdez.heather@epa.gov

From: Valdez, Heather
Sent: Tuesday, July 17, 2018 12:38 PM
To: Valdez, Heather; Fruitwala, Kishor; Galbraith, Michael; Young, Jessica
Cc: Tidmore, Guy; Kohler, Amanda; Elliott, Ross; Atagi, Tracy; Knittel, Janette; McArthur, Lisa
Subject: Hazardous Waste Thermal Desorption

When: Friday, July 20, 2018 11:30 AM-12:30 PM.

Where: R10Sea-ConflLineMM-206-224-0053

Hi, I am hoping you can make a call to discuss the question of TDU + TO regulation further. The State is currently reviewing comments that they just received during a permit modification [REDACTED]

Call in [REDACTED], code [REDACTED]

From: Fruitwala, Kishor

Sent: Tuesday, July 17, 2018 6:07 AM

To: Galbraith, Michael ; Valdez, Heather ; Tidmore, Guy

Cc: Kohler, Amanda ; Young, Jessica ; Elliott, Ross ; Atagi, Tracy

Subject: RE: Hazardous Waste Thermal Desorption

Hi All,

Thank you.

Kishor

Kishor Fruitwala, Ph.D., P.E.

Acting Associate Director for RCRA

Multimedia Division, EPA Region 6

214-665-6669

From: Galbraith, Michael

Sent: Tuesday, July 17, 2018 7:22 AM

To: Valdez, Heather <Valdez.Heather@epa.gov>; Fruitwala, Kishor <Fruitwala.Kishor@epa.gov>; Tidmore, Guy <tidmore.guy@epa.gov>

Cc: Kohler, Amanda <Kohler.Amanda@epa.gov>; Young, Jessica <Young.Jessica@epa.gov>

Subject: Re: Hazardous Waste Thermal Desorption

Heather - this is complicated and we need to carefully think this through, and we need to involve the dsw folks here in orcr, so i cc'd jessica.

I think the next best step would be to have a conference call to discuss all this - [REDACTED]

Mike Galbraith

Permits Branch (5303P)

Program Implementation/Information Division

Office of Resource Conservation and Recovery

U.S. Environmental Protection Agency

1200 Pennsylvania Avenue, NW

Washington, DC 20460

From: Valdez, Heather

Sent: Monday, July 16, 2018 6:32 PM

To: Galbraith, Michael; Fruitwala, Kishor; Tidmore, Guy

Subject: Fw: Hazardous Waste Thermal Desorption

Thanks!

Heather Valdez

RCRA Corrective Action and Permitting Project Manager

1200 6th Ave, AWT-150

Seattle WA, 98101

206-553-6220

valdez.heather@epa.gov

From: Castrilli, Laura

Sent: Monday, July 16, 2018 10:07 AM

To: Valdez, Heather

Cc: Knittel, Janette; McArthur, Lisa

Subject: FW: Hazardous Waste Thermal Desorption

Heather, I think this falls under your expertise/assignment.

Laura Castrilli

(206) 553-4323; castrilli.laura@epa.gov

Office of Air and Waste

EPA Region 10; 1200 Sixth Ave., Suite 155 MS AWT-150; Seattle, WA 98101

From: Hamlin, Tim

Sent: Monday, July 16, 2018 9:35 AM

To: McArthur, Lisa <McArthur.Lisa@epa.gov>; Castrilli, Laura <Castrilli.Laura@epa.gov>

Subject: FW: Hazardous Waste Thermal Desorption

Hi, when appropriate, I'd like to be briefed on this issue and, in any event, would like to reply to Andrew regarding his request to meet.

From: Andrew Marshall [<mailto:andrew.marshall@usecology.com>]

Sent: Saturday, July 14, 2018 9:46 AM

To: Hamlin, Tim <Hamlin.Tim@epa.gov>

Subject: Hazardous Waste Thermal Desorption

Tim,

I hope all is going well in Seattle. I want to express my appreciation of your teams efforts on getting our TSCA permit renewed. It sounds like our Grand View, Idaho facility and your team are working well together to get this renewal knocked out. Thank you.

When we were together a few months ago, I raised an issue that US Ecology has been deeply involved in trying to ensure there is national consistency on the regulatory requirements for thermal desorption technology

used for the treatment of hazardous waste. There is a thermal desorption unit owned and operated by Waste Management in Oregon that we recently discovered is expanding its operation and submitted a RCRA permit modification with the State of Oregon. US Ecology in conjunction with our partner TDX Associates will be submitting comments to Oregon DEQ by the close of the comment period next week. We will cc you on our email submission of comments to ODEQ.

It appears that there has been no consideration for the EPA's extensive review of this technology and resulting interpretation of the regulations which is necessary in establishing necessary operating parameters and emission requirements for this operation. This has us concerned with the direction of the project and the establishment of consistent regulatory interpretations. EPA's position originated in Region 6 as a result of an enforcement action brought against our company. We agree with EPA's interpretation and have been working closely with EPA Region 6 and EPA headquarters staff to ensure EPA's position is consistently applied.

I have included two background documents. One is a May 2, 2016 letter from EPA that discusses the how the vent gasses from a thermal desorption unit operating under the same regulatory provision that Waste Management is proposing to operate under should be regulated under RCRA. The second attachment is a letter dated June 24, 2016 from EPA to the State of Louisiana addressing the same requirements for an identical unit that is being constructed at Waste Management's facility in Carlyss, Louisiana. Waste Management agreed to comply with these requirements in the permit that was issued for their Louisiana facility.

We have found that the many State agencies processing these permits may not be fully aware of EPA's regulatory position and generally have limited experience in permitting hazardous waste operations that include thermal destruction. We would appreciate Region 10's support in working with Oregon DEQ to ensure these regulations are consistently applied. We understand that Richard Duval in ODEQ's Eastern Oregon office is taking the lead on Waste Management's permit modification request.

This treatment technology is very complex and we would appreciate the opportunity to meet with your technical staff in Seattle to discuss the details of how the thermal desorption process works and the conclusions of how EPA interpreted the regulatory requirements. We are also willing to connect your staff with the Region 6 staff that has been involved in these previous projects.

Thanks for your support.

Andrew Marshall

Executive Vice President

Regulatory Compliance and Safety



andrew.marshall@usecology.com

p: 208.519.1638 | c: 208.914.8678

Message

From: Valdez, Heather [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=eb323347294d44009a369c3576798bdf-Valdez, Heather]
Sent: 7/20/2018 6:37:23 PM
To: Fruitwala, Kishor [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a19009ba86a4236b97131d5d16f2fae-Fruitwala, Kishor]; Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]
CC: Tidmore, Guy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e9af087a1ce4703b25a4a8e6fa048dd-Tidmore, Guy]; Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]; Elliott, Ross [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33cb08013cc94c21a3e3236dbad4c4a4-REELLIOT]; Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]; Knittel, Janette [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a955f914e8d34cb19b6f63ac60707d32-Knittel, Janette]; McArthur, Lisa [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=524660efbdb140e7868646d8073f0c72-McArthur, Lisa]
Subject: Re: Hazardous Waste Thermal Desorption

Very sorry we need a larger phone line, Tracy is sending that out now

Heather Valdez
RCRA Corrective Action and Permitting Project Manager
1200 6th Ave, AWT-150
Seattle WA, 98101
206-553-6220
valdez.heather@epa.gov

From: Valdez, Heather
Sent: Tuesday, July 17, 2018 12:38 PM
To: Valdez, Heather; Fruitwala, Kishor; Galbraith, Michael; Young, Jessica
Cc: Tidmore, Guy; Kohler, Amanda; Elliott, Ross; Atagi, Tracy; Knittel, Janette; McArthur, Lisa
Subject: Hazardous Waste Thermal Desorption
When: Friday, July 20, 2018 11:30 AM-12:30 PM.
Where: R10Sea-ConfLineMM-[REDACTED]

Hi, I am hoping you can make a call to discuss the question of TDU + TO regulation further. [REDACTED]

[REDACTED]

Call in [REDACTED] code [REDACTED]

From: Fruitwala, Kishor

Sent: Tuesday, July 17, 2018 6:07 AM
To: Galbraith, Michael ; Valdez, Heather ; Tidmore, Guy
Cc: Kohler, Amanda ; Young, Jessica ; Elliott, Ross ; Atagi, Tracy
Subject: RE: Hazardous Waste Thermal Desorption
Hi All,

[REDACTED]

Thank you.

Kishor

Kishor Fruitwala, Ph.D., P.E.

Acting Associate Director for RCRA

Multimedia Division, EPA Region 6

214-665-6669

From: Galbraith, Michael

Sent: Tuesday, July 17, 2018 7:22 AM

To: Valdez, Heather <Valdez.Heather@epa.gov>; Fruitwala, Kishor <Fruitwala.Kishor@epa.gov>; Tidmore, Guy <tidmore.guy@epa.gov>

Cc: Kohler, Amanda <Kohler.Amanda@epa.gov>; Young, Jessica <Young.Jessica@epa.gov>

Subject: Re: Hazardous Waste Thermal Desorption

Heather - this is complicated and we need to carefully think this through, and we need to involve the dsw folks here in orcr, so i cc'd jessica.

I think the next best step would be to have a conference call to discuss all this - [REDACTED]

[REDACTED]

Mike Galbraith

Permits Branch (5303P)

Program Implementation/Information Division

Office of Resource Conservation and Recovery

U.S. Environmental Protection Agency

1200 Pennsylvania Avenue, NW

Washington, DC 20460

From: Valdez, Heather

Sent: Monday, July 16, 2018 6:32 PM

To: Galbraith, Michael; Fruitwala, Kishor; Tidmore, Guy

Subject: Fw: Hazardous Waste Thermal Desorption

[REDACTED]

Thanks!
Heather Valdez
RCRA Corrective Action and Permitting Project Manager
1200 6th Ave, AWT-150
Seattle WA, 98101
206-553-6220
valdez.heather@epa.gov

From: Castrilli, Laura
Sent: Monday, July 16, 2018 10:07 AM
To: Valdez, Heather
Cc: Knittel, Janette; McArthur, Lisa
Subject: FW: Hazardous Waste Thermal Desorption

Heather, I think this falls under your expertise/assignment. [REDACTED]

[REDACTED]
Laura Castrilli
(206) 553-4323; castrilli.laura@epa.gov
Office of Air and Waste
EPA Region 10; 1200 Sixth Ave., Suite 155 MS AWT-150; Seattle, WA 98101

From: Hamlin, Tim
Sent: Monday, July 16, 2018 9:35 AM
To: McArthur, Lisa <McArthur.Lisa@epa.gov>; Castrilli, Laura <Castrilli.Laura@epa.gov>
Subject: FW: Hazardous Waste Thermal Desorption

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From: Andrew Marshall [<mailto:andrew.marshall@usecology.com>]
Sent: Saturday, July 14, 2018 9:46 AM
To: Hamlin, Tim <Hamlin.Tim@epa.gov>
Subject: Hazardous Waste Thermal Desorption

Tim,
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Thanks for your support.

Andrew Marshall

Executive Vice President

Regulatory Compliance and Safety



andrew.marshall@usecology.com

p: 208.319.1638 | c: 208.914.8678

Message

From: Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]
Sent: 7/17/2018 6:13:54 PM
To: Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]
Subject: RE: 3:00 thermaldyne meeting

Great - thanks!

[REDACTED]
Amanda Kohler
703-347-8975

From: Galbraith, Michael
Sent: Tuesday, July 17, 2018 1:48 PM
To: Kohler, Amanda
Subject: 3:00 thermaldyne meeting

you don't need to go to the 3:00 meeting [REDACTED]
[REDACTED]

Mike Galbraith
Permits Branch (5303P)
Program Implementation/Information Division
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Message

From: Pearson, Evan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d10433f23dd64bd2a3efc03d6367856c-Pearson, Evan]
Sent: 7/17/2018 3:07:20 PM
To: Fruitwala, Kishor [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a19009ba86a4236b97131d5d16f2fae-Fruitwala, Kishor]; Elliott, Ross [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33cb08013cc94c21a3e3236dbad4c4a4-REELLIOT]; Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]; Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]; Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Luschek, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cd6769c1089e464ebe6e5f345960a0cf-Luschek, Robert]; Shah, Harry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=774b35da290741798fca0ed737f707aa-Shah, Harry]; Peace, Michelle [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=13a0429431cb4de484548396727a27c6-Peace, Michelle]; Potts, Mark [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f0f11dc437f944fd8cb779b3316de870-Potts, Mark]; Tidmore, Guy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e9af087a1ce4703b25a4a8e6fa048dd-Tidmore, Guy]; Jones, BruceD [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9026926c877140cbae1d4c0739729813-Jones, BruceD]; Przyborski, Jay [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9b737242096491996b9d73451f3e848-Przyborski, Jay]; Toups, Brad [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f79bc386bf8c4ab681f4e156b456d9a5-Toups, Brad]; Thompson, Steve [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=deb5f1524ae94dc69ed0f4b2d6ca446a-Thompson, Steve]
Subject: RE: Thermalayne Technical Call - EPA only

Evan L. Pearson
Senior Enforcement Counsel (6RC-ER)
RCRA/Toxics Enforcement Branch
Office of Regional Counsel
U.S. EPA - Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733
Phone - (214) 665-8074
Fax - (214) 665-3177
E-Mail - pearson.evan@epa.gov

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-----Original Appointment-----

From: Fruitwala, Kishor

Sent: Monday, July 16, 2018 4:22 PM

To: Elliott, Ross; Atagi, Tracy; Young, Jessica; Galbraith, Michael; Luschek, Robert; Shah, Harry; Peace, Michelle; Potts, Mark; Tidmore, Guy; Jones, Bruce; Przyborski, Jay; Pearson, Evan; Toups, Brad; Thompson, Steve

Subject: Thermaldyne Technical Call - EPA only

When: Tuesday, July 17, 2018 2:00 PM-3:30 PM (UTC-06:00) Central Time (US & Canada).

Where: R6-ConfRm-Jaquarundi-09O15/R6---09th-Floor

Hi All,

As discussed on the conf call today, we will have an internal call to discuss the technical/regulatory questions below. [REDACTED]

Call in # [REDACTED] ID [REDACTED]

Please feel free to invite anyone I might have missed.

Thank you everyone for your support and spending time on this important project.

Kishor

Kishor Fruitwala, Ph.D., P.E.

Acting Associate Director for RCRA

Multimedia Division, EPA Region 6

214-665-6669

THERMALDYNE TECHNICAL QUESTIONS FOR VARIANCE



Any other issues?

Message

From: Elliott, Ross [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33cb08013cc94c21a3e3236dbad4c4a4-REELLIOT]
Sent: 7/17/2018 2:24:00 PM
To: Fruitwala, Kishor [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a19009ba86a4236b97131d5d16f2fae-Fruitwala, Kishor]; Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]; Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]; Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Luscek, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cd6769c1089e464e6e5f345960a0cf-Luscek, Robert]; Shah, Harry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=774b35da290741798fca0ed737f707aa-Shah, Harry]; Peace, Michelle [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=13a0429431cb4de484548396727a27c6-Peace, Michelle]; Potts, Mark [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f0f11dc437f944fd8cb779b3316de870-Potts, Mark]; Tidmore, Guy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e9af087a1ce4703b25a4a8e6fa048dd-Tidmore, Guy]; Jones, Bruce [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9026926c877140cbae1d4c0739729813-Jones, Bruce]; Przyborski, Jay [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9b737242096491996b9d73451f3e848-Przyborski, Jay]; Pearson, Evan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d10433f23dd64bd2a3efc03d6367856c-Pearson, Evan]; Toups, Brad [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f79bc386bf8c4ab681f4e156b456d9a5-Toups, Brad]; Thompson, Steve [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=deb5f1524ae94dc69ed0f4b2d6ca446a-Thompson, Steve]
CC: Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]
Subject: RE: Thermalayne Technical Call - EPA only

From: Fruitwala, Kishor

Sent: Tuesday, July 17, 2018 9:15 AM

To: Atagi, Tracy ; Elliott, Ross ; Young, Jessica ; Galbraith, Michael ; Luschek, Robert ; Shah, Harry ; Peace, Michelle ; Potts, Mark ; Tidmore, Guy ; Jones, Bruce ; Przyborski, Jay ; Pearson, Evan ; Toups, Brad ; Thompson, Steve

Cc: Kohler, Amanda

Subject: RE: Thermaldyne Technical Call - EPA only

[REDACTED]

Thank you.

Kishor

From: Atagi, Tracy

Sent: Tuesday, July 17, 2018 7:44 AM

To: Fruitwala, Kishor <Fruitwala.Kishor@epa.gov>; Elliott, Ross <Elliott.Ross@epa.gov>; Young, Jessica <Young.Jessica@epa.gov>; Galbraith, Michael <Galbraith.Michael@epa.gov>; Luschek, Robert <Luschek.Robert@epa.gov>; Shah, Harry <Shah.Harry@epa.gov>; Peace, Michelle <Peace.Michelle@epa.gov>; Potts, Mark <Potts.Mark@epa.gov>; Tidmore, Guy <tidmore.guy@epa.gov>; Jones, Bruce <Jones.Bruce@epa.gov>; Przyborski, Jay <Przyborski.Jay@epa.gov>; Pearson, Evan <Pearson.Evan@epa.gov>; Toups, Brad <Toups.Brad@epa.gov>; Thompson, Steve <thompson.steve@epa.gov>

Cc: Kohler, Amanda <Kohler.Amanda@epa.gov>

Subject: Re: Thermaldyne Technical Call - EPA only

Thanks, Kishor. I will be on the call. A couple of quick questions:

For questions 2&3, [REDACTED]

From: Fruitwala, Kishor

Sent: Monday, July 16, 2018 5:22 PM

To: Fruitwala, Kishor; Elliott, Ross; Atagi, Tracy; Young, Jessica; Galbraith, Michael; Luschek, Robert; Shah, Harry; Peace, Michelle; Potts, Mark; Tidmore, Guy; Jones, Bruce; Przyborski, Jay; Pearson, Evan; Toups, Brad; Thompson, Steve

Cc: Kohler, Amanda

Subject: Thermaldyne Technical Call - EPA only

When: Tuesday, July 17, 2018 3:00 PM-4:30 PM.

Where: R6-ConfRm-Jaquarundi-09O15/R6---09th-Floor

Hi All,

As discussed on the conf call today, we will have an internal call to discuss the technical/regulatory questions below. [REDACTED]

[REDACTED] ent
[REDACTED]
[REDACTED] R6

Call in # [REDACTED] ID [REDACTED]

Please feel free to invite anyone I might have missed.

Thank you everyone for your support and spending time on this important project.

Kishor

Kishor Fruitwala, Ph.D., P.E.

Acting Associate Director for RCRA


Multimedia Division, EPA Region 6

214-665-6669

THERMALDYNE TECHNICAL QUESTIONS FOR VARIANCE

[REDACTED]

[REDACTED]



Any other issues?

Message

From: Fruitwala, Kishor [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a19009ba86a4236b97131d5d16f2fae-Fruitwala, Kishor]
Sent: 7/17/2018 1:15:08 PM
To: Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcf670077440dfb63a691749f20af2-TATAGI]; Elliott, Ross [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33cb08013cc94c21a3e3236dbad4c4a4-REELLIOT]; Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]; Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Luschek, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cd6769c1089e464e6e5f345960a0cf-Luschek, Robert]; Shah, Harry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=774b35da290741798fca0ed737f707aa-Shah, Harry]; Peace, Michelle [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=13a0429431cb4de484548396727a27c6-Peace, Michelle]; Potts, Mark [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f0f11dc437f944fd8cb779b3316de870-Potts, Mark]; Tidmore, Guy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e9af087a1ce4703b25a4a8e6fa048dd-Tidmore, Guy]; Jones, Bruuced [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9026926c877140cbae1d4c0739729813-Jones, Bruuced]; Przyborski, Jay [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9b737242096491996b9d73451f3e848-Przyborski, Jay]; Pearson, Evan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d10433f23dd64bd2a3efc03d6367856c-Pearson, Evan]; Toups, Brad [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f79bc386bf8c4ab681f4e156b456d9a5-Toups, Brad]; Thompson, Steve [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=deb5f1524ae94dc69ed0f4b2d6ca446a-Thompson, Steve]
CC: Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]
Subject: RE: Thermalayne Technical Call - EPA only

Tracy, what we meant is - [REDACTED]
[REDACTED] We can clarify further during the call today.

Thank you.

Kishor

From: Atagi, Tracy
Sent: Tuesday, July 17, 2018 7:44 AM
To: Fruitwala, Kishor ; Elliott, Ross ; Young, Jessica ; Galbraith, Michael ; Luschek, Robert ; Shah, Harry ; Peace, Michelle ; Potts, Mark ; Tidmore, Guy ; Jones, Bruuced ; Przyborski, Jay ; Pearson, Evan ; Toups, Brad ; Thompson, Steve
Cc: Kohler, Amanda
Subject: Re: Thermalayne Technical Call - EPA only

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Cc: Kohler, Amanda

Subject: Thermaldyne Technical Call - EPA only

When: Tuesday, July 17, 2018 3:00 PM-4:30 PM.

Where: R6-ConfRm-Jaquarundi-09O15/R6---09th-Floor

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[REDACTED]

Call in # 2 [REDACTED] ID [REDACTED]

Please feel free to invite anyone I might have missed.

Thank you everyone for your support and spending time on this important project.

Kishor

Kishor Fruitwala, Ph.D., P.E.

Acting Associate Director for RCRA

Multimedia Division, EPA Region 6

214-665-6669 [REDACTED]

THERMALDYNE TECHNICAL QUESTIONS FOR VARIANCE

[REDACTED]

Any other issues?

Message

From: Fruitwala, Kishor [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a19009ba86a4236b97131d5d16f2fae-Fruitwala, Kishor]
Sent: 7/17/2018 1:07:04 PM
To: Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Valdez, Heather [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=eb323347294d44009a369c3576798bdf-Valdez, Heather]; Tidmore, Guy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e9af087a1ce4703b25a4a8e6fa048dd-Tidmore, Guy]
CC: Kohler, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=665a6cdd3371457fb03d5184f58f7a4a-Kohler, Amanda]; Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]; Elliott, Ross [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33cb08013cc94c21a3e3236dbad4c4a4-REELLIOT]; Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]
Subject: RE: Hazardous Waste Thermal Desorption

Hi All,

[REDACTED]

Thank you.

Kishor

Kishor Fruitwala, Ph.D., P.E.
Acting Associate Director for RCRA
Multimedia Division, EPA Region 6
214-665-6669

From: Galbraith, Michael
Sent: Tuesday, July 17, 2018 7:22 AM
To: Valdez, Heather ; Fruitwala, Kishor ; Tidmore, Guy
Cc: Kohler, Amanda ; Young, Jessica
Subject: Re: Hazardous Waste Thermal Desorption

Heather - this is complicated and we need to carefully think this through, and we need to involve the dsw folks here in orcr, so i cc'd jessica.

I think the next best step would be to have a conference call to discuss all this [REDACTED]
[REDACTED]

Mike Galbraith
Permits Branch (5303P)
Program Implementation/Information Division
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

From: Valdez, Heather
Sent: Monday, July 16, 2018 6:32 PM
To: Galbraith, Michael; Fruitwala, Kishor; Tidmore, Guy
Subject: Fw: Hazardous Waste Thermal Desorption

Hi Mike, Kishor and Guy, how are you? Can you help me to understand something better. We have been looking at a system at a Chem Waste facility in OR. You might recall us talking to you about it, Mike. [REDACTED]

[REDACTED]

Thanks!

Heather Valdez
RCRA Corrective Action and Permitting Project Manager
1200 6th Ave, AWT-150
Seattle WA, 98101
206-553-6220

valdez.heather@epa.gov

From: Castrilli, Laura
Sent: Monday, July 16, 2018 10:07 AM
To: Valdez, Heather
Cc: Knittel, Janette; McArthur, Lisa
Subject: FW: Hazardous Waste Thermal Desorption

Heather, I think this falls under your expertise/assignment. [REDACTED]
[REDACTED]

Laura Castrilli
(206) 553-4323; castrilli.laura@epa.gov
Office of Air and Waste
EPA Region 10; 1200 Sixth Ave., Suite 155 MS AWT-150; Seattle, WA 98101

From: Hamlin, Tim
Sent: Monday, July 16, 2018 9:35 AM
To: McArthur, Lisa <McArthur.Lisa@epa.gov>; Castrilli, Laura <Castrilli.Laura@epa.gov>
Subject: FW: Hazardous Waste Thermal Desorption

Hi, when appropriate, I'd like to be briefed on this issue and, in any event, would like to reply to Andrew regarding his request to meet.

From: Andrew Marshall [<mailto:andrew.marshall@usecology.com>]
Sent: Saturday, July 14, 2018 9:46 AM
To: Hamlin, Tim <Hamlin.Tim@epa.gov>
Subject: Hazardous Waste Thermal Desorption

Tim,

I hope all is going well in Seattle. I want to express my appreciation of your teams efforts on getting our TSCA permit renewed. It sounds like our Grand View, Idaho facility and your team are working well together to get this renewal knocked out. Thank you.

When we were together a few months ago, I raised an issue that US Ecology has been deeply involved in trying to ensure there is national consistency on the regulatory requirements for thermal desorption technology used for the treatment of hazardous waste. There is a thermal desorption unit owned and operated by Waste Management in Oregon that we recently discovered is expanding its operation and submitted a RCRA permit modification with the State of Oregon. US Ecology in conjunction with our partner TDX Associates will be submitting comments to Oregon DEQ by the close of the comment period next week. We will cc you on our email submission of comments to ODEQ.

It appears that there has been no consideration for the EPA's extensive review of this technology and resulting interpretation of the regulations which is necessary in establishing necessary operating parameters and emission requirements for this operation. This has us concerned with the direction of the project and the

establishment of consistent regulatory interpretations. EPA's position originated in Region 6 as a result of an enforcement action brought against our company. We agree with EPA's interpretation and have been working closely with EPA Region 6 and EPA headquarters staff to ensure EPA's position is consistently applied.

I have included two background documents. One is a May 2, 2016 letter from EPA that discusses the how the vent gasses from a thermal desorption unit operating under the same regulatory provision that Waste Management is proposing to operate under should be regulated under RCRA. The second attachment is a letter dated June 24, 2016 from EPA to the State of Louisiana addressing the same requirements for an identical unit that is being constructed at Waste Management's facility in Carlyss, Louisiana. Waste Management agreed to comply with these requirements in the permit that was issued for their Louisiana facility.

We have found that the many State agencies processing these permits may not be fully aware of EPA's regulatory position and generally have limited experience in permitting hazardous waste operations that include thermal destruction. We would appreciate Region 10's support in working with Oregon DEQ to ensure these regulations are consistently applied. We understand that Richard Duval in ODEQ's Eastern Oregon office is taking the lead on Waste Management's permit modification request.

This treatment technology is very complex and we would appreciate the opportunity to meet with your technical staff in Seattle to discuss the details of how the thermal desorption process works and the conclusions of how EPA interpreted the regulatory requirements. We are also willing to connect your staff with the Region 6 staff that has been involved in these previous projects.

Thanks for your support.

Andrew Marshall
Executive Vice President
Regulatory Compliance and Safety



andrew.marshall@usecology.com
p: 208.319.1638 | c: 208.914.8678

Message

From: Atagi, Tracy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ebcfd670077440dfb63a691749f20af2-TATAGI]
Sent: 7/17/2018 12:44:15 PM
To: Fruitwala, Kishor [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7a19009ba86a4236b97131d5d16f2fae-Fruitwala, Kishor]; Elliott, Ross [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33cb08013cc94c21a3e3236dbad4c4a4-REELLIOT]; Young, Jessica [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=26404c78d3dc441f810ac723cf8f9d49-JBIEGELS]; Galbraith, Michael [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0abf7f5c1a5e462e8096cb58ef9757eb-MGALBRAI]; Luschek, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cd6769c1089e464e6e5f345960a0cf-Luschek, Robert]; Shah, Harry [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=774b35da290741798fca0ed737f707aa-Shah, Harry]; Peace, Michelle [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=13a0429431cb4de484548396727a27c6-Peace, Michelle]; Potts, Mark [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f0f11dc437f944fd8cb779b3316de870-Potts, Mark]; Tidmore, Guy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6e9af087a1ce4703b25a4a8e6fa048dd-Tidmore, Guy]; Jones, Bruce [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9026926c877140cbae1d4c0739729813-Jones, Bruce]; Przyborski, Jay [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d9b737242096491996b9d73451f3e848-Przyborski, Jay]; Pearson, Evan [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d10433f23dd64bd2a3efc03d6367856c-Pearson, Evan]; Toups, Brad [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f79bc386bf8c4ab681f4e156b456d9a5-Toups, Brad]; Thompson, Steve [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=deb5f1524ae94dc69ed0f4b2d6ca446a-Thompson, Steve]
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Subject: Re: Thermalayne Technical Call - EPA only

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For questions 2&3, [REDACTED] ?

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Call in # [REDACTED] ID [REDACTED]

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Multimedia Division, EPA Region 6

214-665-6669

THERMALDYNE TECHNICAL QUESTIONS FOR VARIANCE

Any other issues?

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Subject: Fw: Hazardous Waste Thermal Desorption
Attachments: TDU TSDF Letter - 5-2-16.pdf; Chem Waste Permit Letter (Silva) - 6-24-16_EPA_comment_ocr.pdf
Importance: High

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valdez.heather@epa.gov

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